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Governor
JOHN A. SANCHEZ
Lieutenant Governor

# NEW MEXICO ENVIRONMENT DEPARTMENT

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RYAN FLYNN Cabinet Secretary BUTCH TONGATE Deputy Secretary

**Certified Mail – Return Receipt Requested** 

January 21, 2016

Mr. Robert Cain, Board Chairman Ramah Water and Sanitation District P.O. Box 416 Ramah, NM 87321

Re: Ramah Water and Sanitation District, Minor Municipal, SIC 4952, NPDES Compliance Evaluation Inspection, NM0023396, December 21, 2015

Dear Mr. Cain:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas US Environmental Protection Agency, Region VI Enforcement Branch (6EN-WM) Fountain Place 1445 Ross Avenue Dallas, Texas 75202-2733 Bruce Yurdin New Mexico Environment Department Surface Water Quality Bureau Point Source Regulation Section P.O. Box 5469 Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Erin Trujillo at 505-827-0418 or at erin.trujillo@state.nm.us.

## Page 2 of 2 Ramah Water and Sanitation District, NM0023396 January 21, 2016

Sincerely,

/s/Bruce J. Yurdin

Bruce J. Yurdin Program Manager Point Source Regulation Section Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) e-mail
Bill Chavez, NMED District I by e-mail
Brent Larsen & Tung Nguyen, USEPA (6WQ-PP) by e-mail
Isaac Chen, USEPA (6WQ-PP) by e-mail
Damon McElroy, USEPA (CAED) by e-mail
Althea Pat, Ramah Water and Sanitation District by e-mail (rwsdapat@outlook.com)
NMED SWQB Utility Operators Certification Program by e-mail

Form Approved OMB No. 2040-0003 Approval Expires 7-31-85



## **NPDES Compliance Inspection Report**

	Section A: National Data System Coding																																		
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	-Ms. Dorothy Schonley, Vice Chair, Ramah Water & Sanitation District Longitude: -108.501944°																																		
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	1. See attached report and further explanations.																																		
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Ramah Water and Sanitation District-WWTP-12/21/2015	PERMIT NO. <b>NM0023396</b>
SECTION A - PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS S M U U NA (FURTHER EDETAILS: Minor correction on permit and in databases needed for outfall location.	EXPLANATION ATTACHED <u>Yes</u> )
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.	⊠ Y □ N □ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES.	□ Y □ N ⊠ NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT. See details above	□ y ⊠ n □ na
4. ALL DISCHARGES ARE PERMITTED.	⊠Y □N □NA
SECTION B - RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.   DETAILS: NetDMR subscriber agreement was approved May 3, 2011. Current staff did not had No DMRs submitted, accepted or entered after April 2013. Permittee did not provide paper September 2014. Deadline for submitting 10/2015 thru 12/2015 DMRs under 2015 Permit is	ave active access in NetDMR.  DMR records after
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. ${f N}={f See}$ details above	□ y ⊠ n □ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	□ S □ M ⊠ U □ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING.	⊠ y □ n □ na
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	⊠ y □ n □ na
c) ANALYTICAL METHODS AND TECHNIQUES.	□ Y ⊠ N □ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS. $Y = Results of Analyses; N = Results of Calibrations$	□ Y ⊠ N □ NA
e) DATES AND TIMES OF ANALYSES. Did not include both times for pH and TRC to verify holding to	imes. □ Y ⊠ N □ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	⊠ y □ n □ na
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	□ S □ M ⊠ U □ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	□ S □ M ⊠ U □ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA. 2008 Permit	⊠ Y □ N □ NA
SECTION C - OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.	
1. TREATMENT UNITS PROPERLY OPERATED. <b>Chlorination and/or de-chlorination basins</b>	□s □ m ⊠ u □ NA
2. Treatment units properly maintained. <b>See details above</b>	□s⊠m□u □na
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. <b>Diesel generator</b>	⊠ s □ m □ u □ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	□S □M ⊠ U □NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE. <b>Nitrogen removal</b>	□ S ⊠ M □ U □ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	□S □M ⅪU □NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	⊠ s □ m □ u □ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. <b>Manuals need updated according to Permittee WW</b> STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.  PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	TP Operator □ Y ⊠ N □ NA □ Y ⊠ N □ NA □ Y ⊠ N □ NA

Ramah Water and Sanitation District-WWTP-12/21/2015	PERMIT NO. <b>NM0023396</b>
SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)	
9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	□ Y ⊠ N □ NA □ Y □ N ⊠ NA □ Y □ N ⊠ NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	□ y ⊠ n □ na □ y □ n ⊠ na
SECTION D - SELF-MONITORING	
PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. □ S □ M ☒ U □ NA (FURTHE DETAILS: 2015 & 2008 Permit require 24-hr flow proportioned composite for WET monitoring occurred for 2015 Permit.	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	⊠ y □ N □ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	⊠ y □ n □ na
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT. $N=2008$ Permit. See details about	ve □ Y ⊠ N □ NA
BOD and TSS Influent 4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. TDS Drinking Water Intak	xe □ Y ⋈ N □ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT. <b>2008 Permit TRC</b>	□ y ⊠ n □ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE.	□ y ⊠ n □ na
a) SAMPLES REFRIGERATED DURING COMPOSITING. 2015 Permit WET	□ y □ N ⊠ NA
b) PROPER PRESERVATION TECHNIQUES USED.	⊠ y □ n □ na
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3. <b>Both 2008 and 2015 Permit pH &amp;</b>	TRC YNN NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT? <b>DMRs not submitted</b>	□y⊠n□na
SECTION E - FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. □ S □ M ☒ U □ NA (FURTHER EX DETAILS: 2015 Permit requires flow measurement "instantaneous grab" once/day. 2008 Perm once/week. Flow measurement subject to accuracy requirements in Part III.C.6 of the perm	it required "instantaneous"
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  TYPE OF DEVICE <b>V-Notched Weir w/non-contact ultrasonic measurement system and recorder</b>	□ y ⊠ n □ na
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	⊠ y □ N □ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	⊠ y □ N □ NA
4. CALIBRATION FREQUENCY ADEQUATE. <b>Not documented</b> RECORDS MAINTAINED OF CALIBRATION PROCEDURES. <b>Not documented</b> CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. <b>Documents not provided</b>	□ y ⊠ n □ na □ y ⊠ n □ na □ y ⊠ n □ na
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	⊠ y □ N □ NA
6. HEAD MEASURED AT PROPER LOCATION. <b>Not documented</b>	□ y ⊠ n □ na
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	⊠ y □ n □ na
SECTION F - LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. □ S ☒ M □ U □ NA (FURTHER EX	
DETAILS: Contract laboratory not inspected. TRC and pH are to be analyzed within 15 minut  1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES). pH and TRC	Tes of collection.  □ Y ☒ N □ NA

	Ramah Water	and Sanitation D	District-WWTP-1	2/21/2015		PERMIT NO. <b>N</b> M	100233	396
SECTION F - LAN	BORATORY (CONT	<b>'D</b> )						
2. IF ALTERNATIVE	ANALYTICAL PROCEI	DURES ARE USED, PRO	DPER APPROVAL HAS I	BEEN OBTAINED.		□ у	□ n [	× NA
3. SATISFACTORY C	CALIBRATION AND MA	AINTENANCE OF INSTE	RUMENTS AND EQUIPM	мент. <b>Not docume</b>	ented	□ѕ□м	X U	□ NA
4. QUALITY CONTR	OL PROCEDURES ADE	QUATE. <b>See Furth</b>	er Explanations			□ s □ м	X U [	∃ NA
5. DUPLICATE SAMI	PLES ARE ANALYZED.		E. See Further Ex	xplanations		□ Y	× <sub>N</sub> [	□ na
6. SPIKED SAMPLES	ARE ANALYZED. <b>p</b>	H = Not docume	nted / Contract	Laboratory 100	% OF THE TIME	. П ү	× <sub>N</sub> [	□ NA
7. COMMERCIAL LA	ABORATORY USED. ${f B}$	ut, Whole Efflu	ent Toxicity (W	ET) laboratory 1	not contract	ed. 🗵 Y	□ N [	□ na
LAB ADDRESS <b>49</b>	ll Environmental 101 Hawkins, NE, RFORMED <u>BOD, TS</u>	Albuquerque, N	M 87109, 505-34	5-397 <u>5</u>				
SECTION G - EFI	FLUENT/RECEIVIN	G WATERS OBSER	VATIONS. □	s 🗆 м 🗵 и 🗆 N	A (FURTHER EXP	LANATION ATTACHED	<u>Yes</u> ).	
OUTFALL NO. Outfall 001	OIL SHEEN Not Observed	GREASE Not Observed	TURBIDITY Not Observed	VISIBLE FOAM Not Observed	FLOAT SO  Not Observe			OTHER NA
			it limits recorded atfall appeared cl					
SECTION H - SLU	JDGE DISPOSAL							
SLUDGE DISPOSAL DETAILS:	MEETS PERMIT REQU	JIREMENTS.		s □ m ⊠ u □ n	A (FURTHER EXF	PLANATION ATTACHED	Yes_).	
1. SLUDGE MANAG	GEMENT ADEQUATE TO	O MAINTAIN EFFLUEN	T QUALITY.			□s⊠m	□u I	□ NA
2. SLUDGE RECORI	OS MAINTAINED AS RI	EQUIRED BY 40 CFR 50	03.			□ s □ m	X U	□ NA
3. FOR LAND APPLI SITE)	IED SLUDGE, TYPE OF	LAND APPLIED TO: $\underline{P}$	ast application n	ot documented	(e.g., FOREST, AC	GRICULTURAL, PUBL	IC CONT	ГАСТ
SECTION I - SAN	MPLING INSPECTIO	ON PROCEDURES	(FURTHER EXPLANATIO)	NATTACHED <u><b>No</b></u> ).				
1. SAMPLES OBTAI	NED THIS INSPECTION	N.				□ у	□N	× NA
2. TYPE OF SAMPLI	E OBTAINED							
GRAB	COM	MPOSITE SAMPLE	METHOD FF	REQUENCY				
3. SAMPLES PRESE	RVED.						□ N	
4. FLOW PROPORTI	ONED SAMPLES OBTA	AINED.					□N	
5. SAMPLE OBTAIN	ED FROM FACILITY'S	SAMPLING DEVICE.						
	ENTATIVE OF VOLUM	E AND MATURE OF DI	SCHARGE.					
7. SAMPLE SPLIT W								
8. CHAIN-OF-CUST	ODY PROCEDURES EM	IPLOYED.				∐ Y	□N	× NA
9. SAMPLES COLLE	ECTED IN ACCORDANC	CE WITH PERMIT.				□ Y	□NI	× NA

## Ramah Water and Sanitation District WWTP Compliance Evaluation Inspection NPDES Permit No. NM0023396 December 21, 2015

### **Further Explanations**

## **Introduction**

On December 21, 2015, Erin S. Trujillo of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Ramah Wastewater Treatment (WWTP), a domestic waste water package plant that is owned and operated by the Ramah Water and Sanitation District (RW&SD) at 47-A N. Bloomfield Avenue, Ramah, New Mexico in McKinley County.

RW&SD WWTP has a recorded design flow capacity of 0.058 MGD (million gallons per day) and is classified as a minor discharger under the Federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0023396. This permit regulates the WWTP discharge to Togeye Drain, thence approximately 0.5 miles to Cebolla Creek, thence approximately 3.5 miles to the Rio Pescado, thence to the Zuni River, thence to the Little Colorado River in the Colorado River Basin. RW&SD WWTP has an expired permit DP-1235 with the State of New Mexico Groundwater Quality Bureau (GWQB).

Cebolla Creek from Zuni Pueblo to Ramah Reservoir is subject to Segment 20.6.4.98 New Mexico Administrative Code (NMAC) according to the State of New Mexico Standards for Interstate and Intrastate Surface Waters in 20.6.4 NMAC and has designated uses of livestock watering, wildlife habitat, primary contact and marginal warm water aquatic life. The assessment unit of Cebolla Creek has not been assessed and the referenced water quality standard citation is under review by NMED.

RW&SD representatives were contacted by this inspector, Ms. Trujillo, prior to this inspection to make arrangements for a district official to be available on the day of the CEI. Upon arrival at the District's office at 3367 Bond Street, Ramah, New Mexico 87321, 505-783-4018 at approximately 1250 hours on the day of the CEI, the inspector conducted an entrance interview with Ms. Althea Pat, RW&SD Office Manager/Accountant, Mr. Flint Tietjin, RW&SD WWTP Waste Water Level I Operator, and later Ms. Dorothy Schonley, RW&SD Vice Chair. Ms. Trujillo made introductions, presented credentials and explained the purpose of the inspection to the on-site Permittee representatives. The inspector and Mr. Tietjin traveled to and toured the WWTP package plant. Following the tour, an exit interview was conducted at the District's office with Ms. Pat, Mr. Tietjin and Ms. Schonley to present the preliminary findings of the inspection. The inspector left the facility at approximately 1530 hours on the day of the CEI.

NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the Federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This report is based on review of files maintained by the permittee and NMED, on-site observation by NMED personnel, and verbal information provided by the Permittee representatives. For this CEI Report, findings described in previous 2014 (conducted on August 5, 2014), 2012 (conducted on October 2, 2012) and 2011 (conducted on March 1, 2011) CEI Reports have been summarized. Table 1 below is a list of USEPA Region 6 NPDES enforcement orders and brief summary of major issues and compliance timeframes.

**Table 1: Previous USEPA Compliance Orders** 

06/18/2015	CWA-06-2015-1781	Failure to re-apply timely. Failure to submit Discharge Monitoring Reports
		(DMRs). 60 day compliance
06/06/2013	CWA-06-2013-1814	Effluent violation, whole effluent toxicity (WET) monitoring and operation and maintenance (O&M) non-compliance. Stockpiled sludge to be removed. 30 day compliance
09/27/2011	CWA-06-2011-1774	Failure to properly operate plant. Failure to submit DMRs. 30 day compliance

During the CEI, Permittee representatives indicated the need for additional guidance on contacts, calculations and conversions necessary for reporting non-compliance and monitoring as required by the RW&SD's NPDES Permit. A list of USEPA compliance and enforcement staff and NMED contacts is provided in Appendix A. Appendix A also provides web links for more information on USEPA electronic reporting database NetDMR. If not discussed in findings below, additional USEPA guidance for calculations is provided in Appendix B.

### **Treatment Scheme**

Ramah is an unincorporated community in McKinley County and has a recorded population in 2010 of 370 (population change since 2000: -9.1%). A population of 500 is recorded to be served by the public water supply in NMED drinking water system on-line records. The District's connections include approximately 120 residential homes; businesses including two restaurants, convenience store and automotive shop; church; and two schools. The elementary school, with an enrollment of 182, has a cafeteria, laundry facilities, and shower; and the middle/high school, with an enrollment of 191, has a cafeteria and shower facilities. Source of Ramah school enrollment data the 2014-2015 School Year was available on-line http://www.ped.state.nm.us/it/schoolfactsheets.html.

The extended aeration, activated sludge package plant was constructed in approximately 2000. The treatment train of the package plant is preceded by a small wet well lift station. The plant includes a bar screen, anoxic basin, aeration basin, secondary clarifier with two return activated sludge (RAS) lines, wasting tank-aerobic sludge digester, chlorine contact chamber, and de-chlorination unit. The Permittee WWTP Operator described that the plant's aeration is usually run continuously. Discharge flow is daily and mostly continuous. Reviewed records indicate the estimate flow from January 2013 to September 2014 ranged between 0.020 and 0.028 MGD (30-day average) and 0.021 and 0.037 MGD (7-day average).

Raw sewage in the collection system flows by gravity to the on-site lift station. Influent passes through the manual bar screen and enters an anoxic basin or chamber of the plant. Following the anoxic basin, a baffle directs wastewater through an opening into a narrow partition channel as a means to capture a portion of the floatable solids before they enter the aeration basin. Solids collected in this channel are pumped to the sludge digester portion of the plant. The sludge holding tank, anoxic tank, aeration tank, clarifier tank, chlorine contact tank, dechlorination tablet feeder tube all have gravity flow.

From the aeration basin, wastewater enters the secondary clarifier then enters the chlorine chamber. After chlorination, the effluent enters the de-chlorination chamber and then flows through a v-notch weir to the outfall at Togeye Drain. Flow measurement ultrasonic meter equipment is mounted upstream of the V-notch weir.

## **Solids Management**

The facility has three concrete sludge drying beds with underdrains to collect excess wastewater, which would have the ability to be pumped and return to the headworks.

### Section A - Permit Verification - Overall rating of "Marginal"

### **Permit Requirements**

Part I.A of the previous 2008 Permit effective February 1, 2008 which was replaced October 1, 2015 stated:

Permit No. NM0023396 Page 1 of Part I

#### SECTION A. LIMITATIONS AND MONITORING REQUIREMENTS

#### Final Effluent limits - 0.058 mgd design flow.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from outfall 001. Such discharges shall be limited and monitored by the permittee as specified below:

EFFLUENT CHARA	ACTERISTICS		LIMITATIONS rd Units	MONITORING REQUIREMENTS				
POLLUTANT	STORET CODE	MINIMUM	MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE			
PH	00400	6.0	9.0	Once/Month	Grab			

EFFLUENT CHARACT	4	DISC	HARGE LIMIT	100	MONITORING REQUIREMENTS					
EFFLUENT CHARACT	ERISTICS	lbs/day, un	less noted 🖟	m	g/l, unless no	ted	MONITORING REQUIREMENTS			
POLLUTANT	STORET CODE	30-DAY AVG	7-DAY AVG	30-DAY AVG	7-DAY AVG	DAILY MAX	MEASUREMENT FREQUENCY	SAMPLE TYPE		
Flow	50050	Report MGD	Report MGD	***	***	***	Twice/Week	Instantaneous		
Biochemical Oxygen Demand, 5-day	00310	14.5	21.7	30	45	N/A	Once/Month	Grab		
Total Suspended Solids	00530	14.5	21.7	30	45	N/A	Once/Month	Grab		
E. coli Bacteria	51040	N/A	N/A	Report (*1)	N/A	Report (*1)	Once/Month	Grab		
E. coli Bacteria	51040	N/A	N/A	548 (*1)	N/A	2507 (*1)	Once/Month	Grab		
Total Residual Chlorine	50060	N/A	N/A	N/A	N/A	11 ug/l (*2)	Once/Month	Grab (*2)		
Total Dissolved Solids	70296	Report	N/A	N/A	Report	N/A (*3)	Once/3-Months	Grab		

ÉFFLUENT CHARACTERISTICS	DISCHARGE	MONITORING	MONITORING REQUIREMENTS			
WHOLE EFFLUENT TOXICITY TESTING (48-Hour Static Renewal)	30-DAY AVG MINIMUM	48-HR MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE		
Daphnia pulex	Report	Report	Once/First Year of Permit (*4, 5)	24-Hr Composite		

There shall be no discharge of floating solids or visible foam in other than trace amounts.

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#### Sampling Location

Samples taken in compliance with the monitoring requirements specified above shall be taken at the discharge from the final treatment unit.

#### Footnotes

- \*1 Colony forming units (cfu) per 100 ml.
- \*2. The effluent limitation for TRC is the instantaneous maximum and cannot be averaged for reporting purposes. Instantaneous sample shall mean analyzed within 15-minutes of sample collection. (See Part II, Section A)
- \*3. TDS shall be reported as the difference between the drinking water intake TDS and the plant discharge TDS. For the purposes of reporting on the DMR, only report the difference between the drinking water and the plant effluent. Sample the drinking water once per calendar year, and for the four effluent samples in each calendar, report the difference between the two. The facility shall however keep a record of the actual drinking water and plant discharge TDS values onsite for inspection. This record shall be continuously maintained for three (3) years, and be made available for inspections by EPA and/or State inspectors
- \* 4. The sample for the first WET test for Outfall 001 shall be taken during the period November | and April 30 during the first year of the permit. The permittee shall submit the results of any toxicity testing performed in accordance with the Part II of the Permit. See Part II, Whole Effluent Toxicity Testing Requirements for additional WET monitoring and reporting conditions.
- \*5 This permit does not establish requirements to automatically increase the WET testing frequency after a test failure, or to begin a toxicity reduction evaluation (TRE) in the event of multiple test failures. However, upon failure of any WET test, the permittee must report the test results to EPA and NMED, Surface Water Quality Bureau, in writing, within 5 business days of notification of the test failure. EPA and NMED will review the test results and determine the appropriate action necessary, if any. (See Part II, Section E)

Changes and additions were made to the RW&SD's NPDES Permit in 2015. Part I.A (Limitations and Monitoring Requirements) of the **2015 Permit** effective October 1, 2015 states:

NPDES Permit No. NM0023396

#### SECTION A. LIMITATIONS AND MONITORING REQUIREMENTS

#### Final Effluent limits - 0.058 mgd design flow.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from outfall 001. Such discharges shall be limited and monitored by the permittee as specified below:

EFFLUENT CH	IARACTEI	RISTICS		E LIMITATIONS lard Units	MONITORING REQUIREMENTS				
POLLUTANT		STORET CODE	MINIMUM	MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE			
PH		00400	6.6	9.0	Five/Week	Grab			

EFFLUENT CHARACTERISTICS		DISC	HARGE LIMIT	ATIONS		MONITORING	G REQUIREMENTS
EFFEDENT CHARACTERISTICS	lbs/day, un	less noted	m	g/l, unless no	ted	MONTORING	3 REQUIREMENTS
POLLUTANT	30-DAY AVG	7-DAY AVG	30-DAY AVG	7-DAY AVG	DAILY MAX	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	Report MGD	Report MGD	***	***	***	Once/Day	Instantaneous Grab
Biochemical Oxygen Demand, 5-day (BOD)	14.5	21.7	30	45	N/A	Once/Month	Grab
Total Suspended Solids (TSS)	14.5	21.7	30	45	N/A	Once/Month	Grab
BOD % Removal (*1)	85 %	N/A	N/A	N/A	N/A	Once/Month	Calculation
TSS % Removal (*1)	85 %	N/A	N/A	N/A	N/A	Once/Month	Calculation
E. coli Bacteria (*2)	N/A	N/A	206 (*2)	N/A	940 (*2)	Once/Month	Grab
Total Residual Chlorine	N/A	N/A	N/A	N/A	11 ug/l (*3)	Five/Week	Grab (*3)
Total Dissolved Solids, Water Intake	Report	N/A	Report (*4)	N/A	Report	Once/Year	Grab
Total Dissolved Solids, Effluent	Report	N/A	Report (*5)	N/A	Report	Once/3-Months	Grab
Total Dissolved Solids, Net	Report	N/A	400 (*6)	N/A	Report	Once/3-Months	Calculation (*6)

EFFLUENT CHARACTERISTICS	DISCHARGE	MONITORING	MONITORING REQUIREMENTS			
WHOLE EFFLUENT TOXICITY TESTING (7-Dat Static Renewal)	30-DAY AVG MINIMUM	7-DAY MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE		
Pimephales promelas	Report	Report	Once/First Year of Permit (*7, *8)	24-Hr Composite		
Ceriodaphania dubia	Report	Report	Once/First Year of Permit (*7, *8)	24-Hr Composite		

#### Sampling Location

Samples taken in compliance with the monitoring requirements specified above shall be taken at the discharge from the final treatment unit prior to mixing with receiving stream water.

#### Footnotes

- \*1. % Removal = (30-Day Ave Influent Conc. 30-Dat Ave Effluent Conc.) ÷ 30-Day Ave Influent Conc.
- \*2. Colony forming units (cfu) per 100 ml or count per 100 ml.
- \*3. The effluent limitation for TRC is the instantaneous maximum and cannot be averaged for reporting purposes. Instantaneous sample shall mean analyzed within 15-minutes of sample collection.
- \*4. Report total dissolved solids (TDS) at the intake water to the drinking water plant.
- \*5. Report TDS at the effluent.
- \*6. Net TDS shall be reported as the difference between the drinking water intake TDS and the plant discharge TDS. For the purposes of reporting on the DMR, geometric mean may be reported if more than one samples are taken during the reporting period. The facility shall keep a record of the actual drinking water intake TDS values and plant discharge TDS values onsite for inspection. This record shall be continuously maintained for three (3) years, and be made available for inspections by EPA and/or State inspectors
- \*7. The sample for the first WET test for Outfall 001 shall be taken during the period November 1 and April 30 during the first year of the permit. The permittee shall submit the results of any toxicity testing performed in accordance with the Part II of the Permit. See Part II, Whole Effluent Toxicity Testing Requirements for additional WET monitoring and reporting conditions.
- \*8. This permit does not establish requirements to automatically increase the WET testing frequency after a test failure, or to begin a toxicity reduction evaluation (TRE) in the event of multiple test failures. However, upon failure of any WET test, the permittee must report the test results to EPA and NMED, Surface Water Quality Bureau, in writing, within 5 business days of notification of the test failure. EPA and NMED will review the test results and determine the appropriate action necessary, if any. (See Part II, Section E)

Part I.A of the 2008 and 2015 Permits require the monitoring and reporting of the net difference between the annual drinking water intake Total Dissolved Solids (TDS) and the plant discharge TDS once per 3 months. Part I.A of the 2015 Permit requires annual reporting of water intake TDS. Part I.A of the 2015 Permit also requires a net TDS 30-day Avg limitation of 400 mg/L. Footnotes in the Permits changed as follows:

• Footnote 3 of the 2008 Permit stated:

\*3. TDS shall be reported as the difference between the drinking water intake TDS and the plant discharge TDS. For the purposes of reporting on the DMR, only report the difference between the drinking water and the plant effluent. Sample the drinking water once per calendar year, and for the four effluent samples in each calendar, report the difference between the two. The facility shall however keep a record of the actual drinking water and plant discharge TDS values onsite for inspection. This record shall be continuously maintained for three (3) years, and be made available for inspections by EPA and/or State inspectors

• Footnote 4 of Part I.A of the 2015 Permit states "Report total dissolved solids (TDS) at the intake water to the drinking water plant." Footnote 6 of the 2015 Permit states:

\*6. Net TDS shall be reported as the difference between the drinking water intake TDS and the plant discharge TDS. For the purposes of reporting on the DMR, geometric mean may be reported if more than one samples are taken during the reporting period. The facility shall keep a record of the actual drinking water intake TDS values and plant discharge TDS values onsite for inspection. This record shall be continuously maintained for three (3) years, and be made available for inspections by EPA and/or State inspectors

Part III.D.9 (Other Information) of the permit states "Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information."

## **Findings** for Permit Verification

Outfall Location Needs Correction: The latitude location of the discharge point is as not as described on the Signature Authorization page of the permit. The following is a minor correction for the RW&SD outfall:

	Deg, Min, Seconds	<u>Decimal Degrees</u>
Authorized/Title Page of Permit	35° 7' 45.00" N, 108° 30' 7.00"W	
Actual Location	35° 7' 46.00" N, 108° 30' 7.00"W	35.129444°, -108.501944°

O TDS Monitoring and Calculation Clarification: Ramah does not have a drinking water plant as indicated in Footnote 4 of the 2015 Permit, but three individual wells. During the exit interview, Permittee representatives indicated that they did not know where to collect a sample to satisfy the water intake monitoring condition of the 2015 Permit.

Additional Notes: Previous RW&SD operator records dated June 2013 indicate TDS control (drinking water intake) was 427 mg/L; however, day of sample collection, associated laboratory analytical report(s) or location of sample collection was not noted on provided records.

Permittee representatives described that there was no central collection system or drinking water plant and that three (3) public water supply wells flow directly into the water distribution system at separate locations. For public water system requirements, each drinking water well is sampled separately. Also, water in the RW&SD storage tank may not be representative of the entire system.

Permittee would need to contact the USEPA Region 6 Permit Writer to obtain clarification about the monitoring location(s) and any necessary calculations to represent the drinking water intake (see Appendix A for contact information).

<u>Percent Removal Clarification</u>: The formula in Footnote #1 of Part I.A of the Permit effective October 1, 2015, has a typo and is incomplete. Footnote #1 states:

#### Footnotes

\*1. % Removal = (30-Day Ave Influent Conc. - 30-Dat Ave Effluent Conc.) ÷ 30-Day Ave Influent Conc.

Using a similar format style as in the Permit, the following is a clarification:

\*1. % Removal =  $[(30\text{-}Day \text{ Ave Influent Conc.} - 30\text{-}Day \text{ Ave Effluent Conc.}) \div (30\text{-}Day \text{ Ave Influent Conc.})] \times 100$ 

<u>Additional Notes</u>: In USEPA Region 6's NPDES permit, 85% removal limitation (i.e., greater or equal (≥) to 85%) is shown in the loading column of the permit. In the 2015 Permit Footnote #1, concentration data is used to calculate Biochemical Oxygen Demand (BOD) % and Total Suspended Solids (TSS) % removal.

## Section B - Recordkeeping and Reporting Evaluation - Overall rating of "Unsatisfactory"

## **Permit Requirements**

Part II.B of the 2008 and 2015 Permits state:

#### 24-HOUR ORAL REPORTING: DAILY MAXIMUM LIMITATION VIOLATIONS

Under the provisions of Part III.D.7.b.(3) of this permit, violations of daily maximum limitations for the following pollutants shall be reported orally to EPA Region 6, Compliance and Assurance Division, Water Enforcement Branch (6EN-W), Dallas, Texas, and concurrently to NMED within 24 hours from the time the permittee becomes aware of the violation followed by a written report in five days. The Pueblo of Zuni shall also be notified at P.O. BOX 339, Zuni, NM, 87327, telephone # 505-782-7000 due to its close proximity to the treatment facility.

TRC

E. coli bacteria

### Part III, Section C.3, Retention of Records of the 2008 and 2015 Permits state:

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, for a period of at least 3 years from the date of the sample, measurement, report or application. This period may be extended by request of the Director at any time.

Part III, Section D.4, Record Contents of the 2008 and 2015 Permit state:

Records of monitoring information shall include:

- a. The date, exact place, and time of sampling or measurements;
- b. The individual(s) who performed the sampling or measurements;
- c. The date(s) and time(s) analyses were performed;
- *d. The individual(s) who performed the analyses;*
- e. The analytical techniques or methods used; and
- f. The results of such analyses.

Part III, Section D.4, Discharge Monitoring Reports and Other Reports of the 2008 and 2015 Permits state:

Monitoring results must be reported on Discharge Monitoring Report (DMR) Form EPA Number 3320-1in accordance with the "General Instructions" provided on the form. The permittee shall submit the original DMR signed and certified as required by Part III.D.11 and all other reports required by Part III.D to the EPA at the address below. Duplicate copies of DMRs and all other reports shall be submitted to the appropriate State agency(ies)....

### Findings for Recordkeeping and Reporting

 DMRs had still not been submitted to USEPA in accordance with the previous 2008 Permit conditions; as ordered by USEPA enforcement action letter dated June 18, 2015; and thru the administratively continued 2008 permit thru September 30, 2015.

**Failure to submit DMRs per the conditions of the permit is a repeat finding.** Failure to submit DMRs was a finding of the 2011 CEI Report. Failure to submit DMRs since March of 2013 was discussed in the 2014 CEI Report. USEPA Enforcement Action CWA-06-2015-1781 dated June 18, 2015 states "The order requires the submission of discharge monitoring data for the period since the permit expired on January 31, 2013 or to provide an explanation for why such data cannot be provided."

<u>Additional Notes</u>: Permittee's NetDMR subscriber agreement to submit DMRs electronically to USEPA was approved May 3, 2011. Permittee's office manager/accountant indicated that the RW&SD staff did not have current access to submit DMRs electronically.

Permittee's office manager/accountant described contacting USEPA and e-mailing paper DMRs following receipt of the 2015 enforcement order. September 2014 was last DMR submitted to EPA according to the Permittee Representative. Documentation that the e-mailed DMRs were received and accepted by USEPA was not readily available during or provided following this CEI.

Copies of paper DMRs records after January 2013 kept by the Permittee that were provided to this Inspector during this CEI are provided in Appendix C. Certification/signatures on the paper DMRs were not dated. No paper DMRs were provided for the time period between October 2014 thru September 2015. Permittee also does not have paper monthly, quarterly and yearly DMRs that would meet the requirements for reporting under the 2008 or 2015 Permits. For example, quarterly monitoring was included on monthly monitoring paper DMRs prepared under the 2008 Permit. Labels for 7-day averages were not on the paper DMRs prepared under the 2008 Permit. Permittee did not report have separate Whole Effluent Toxicity (WET) DMRs to report bio-monitoring results of samples collected in 2013.

During the exit interview of this CEI, this Inspector recommended to on-site Permittee representatives that the RW&SD contact and respond in writing to USEPA regarding the status and their anticipated schedule of complying with the 2015 enforcement order. Part I.C of the 2015 Permit requires DMR reporting periods which start January 28, 2016. The Permittee can contact USEPA to report non-compliance under the 2015 Permit. See Appendix A for contacts.

- Permittee representatives had made an effort to compile available recordkeeping since the last CEI. Provided recordkeeping, including available paper DMRs as discussed above, was incomplete, for example:
  - Reviewed recordkeeping after September 2014 did not include loading calculations for BOD and TSS.
  - Flow measurement records, pH and total residual chlorine (TRC) monitoring bench sheets, analytical laboratory results, and/or calculations were missing for some months. Inconsistencies and record gaps are summarized further below in Table 2:

Table 2: Review of RW&SD Records under the 2008 Permit

FEB 2013	USEPA indicates that DMR was submitted. Associated kept records were not readily available or provided by Permittee.	
MAR 2013	February 2013 BOD & TSS data appears to have recorded on March 2013 paper DMR. No TRC or pH monitoring data records provided.	
APR 2013	No pH and TRC monitoring data records provided.	
MAY 2013	Monitoring period and exceedances are incorrectly recorded on paper DMR.	
JAN 2014	No records or paper DMR provided.	

FEB 2014	Reason for recording of flow exceedances was not determined.			
MAR 2014	Reason for recording of flow exceedances was not determined.			
APR 2014	No laboratory analytical reports for BOD, TSS, TDS, or E.coli provided.			
JUN 2014	Reason for recording of flow exceedances was not determined.			
SEP 2014	No laboratory analytical report for BOD, TSS, E.coli or TDS provided.			
FEB 2015	To flow records provided.			
MAR 2015	No flow records provided.			
APR 2015	No flow records provided.			
MAY 2015	No flow records provided.			
JUL 2015	No pH, TRC or flow records provided			
AUG 2015	No pH, TRC or flow records provided			
SEP 2015	No flow records provided.			

- Permittee's 2014 renewal permit application was requested during the CEI, but the application was not readily available or provided during or following this CEI.
- NMED SWQB files do not have record of 24-hour oral reporting of daily maximum limitation violations required in Part II.B of the Permit for E.coli bacteria and TRC under the 2008 Permit and TRC under the 2015 Permit. Findings for effluent exceedances are further discussed in Section G of this report.
- o Additional findings for recordkeeping are in Section C (Operation and Maintenance), Section E (Flow Measurement), Section F (Laboratory) and Section H (Sludge) of this report.

### Section C - Operations and Maintenance - Overall rating of "Unsatisfactory"

#### **Permit Requirements**

Part III.B.3 (Proper Operation and Maintenance) of the 2008 and 2015 Permits state:

- a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.
- b. The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

### Part I.E (Pollution Prevention Requirements) of the 2008 and 2015 Permits state:

#### SECTION E. POLLUTION PREVENTION REQUIREMENTS

- The permittee shall institute a program within 12 months of the effective date of the
  permit (or continue an existing one) directed towards optimizing the efficiency and
  extending the useful life of the facility. The permittee shall consider the following
  items in the program:
  - The influent loadings, flow and design capacity;
  - The effluent quality and plant performance;
  - C. The age and expected life of the wastewater treatment facility's equipment;
  - D. Bypasses and overflows of the tributary sewerage system and treatment works;
  - E. New developments at the facility;
  - F. Operator certification and training plans and status;
  - G. The financial status of the facility;
  - H. Preventative maintenance programs and equipment conditions and;
  - An overall evaluation of conditions at the facility.

### **Findings** for Operation and Maintenance

- O Plant has an inadequate alarm system for power or equipment failures. Permittee WWTP Operator described that a security light at the plant was visible from his home and would go out if there was a power outage at the plant. Other than the security light, no other alarm system is provided at the plant for equipment failures. This is a repeat finding (2011 CEI Report).
- o Generator/back up power is operated manually and does not automatically turn on if there is a power failure. **This is a repeat finding** (2011 and 2012 CEI Reports).
- Plant's design nitrogen removal was not maintained or operable as designed—"paddle" mixer was no longer installed. Anoxic basin aeration / mixer not functioning was a similar finding discussed in the 2011 and 2014 CEI Reports.
- o Plant's sludge holding tank in the secondary clarifier had little freeboard remaining. A similar finding was discussed in the 2014 CEI Report. Plant's operator described that sludge accumulates in the disinfection basin. Additional findings for sludge management operation and maintenance are in Section H of this report.
- Plant's secondary clarifier had floating solids and algal growth on weirs that need to be skimmed, cleaned and removed. Maintenance had notably improved from the previous finding that the secondary clarifier was crusted over and bulking as described and shown in photos of the 2012 CEI Report.
- o Plant's disinfection basin weirs had algal growth that needed to be cleaned and removed.
- Exceedances of permit limits for E.coli Bacteria and TRC may indicate that the operation of the disinfection and de-chlorination feeders need to be optimized. Effluent exceedances are discussed in Section G of this CEI Report.
- o Operation and maintenance manuals were available, but needed to be updated according to the Permittee WWTP Operator.
- o Standard operating procedures and schedules of equipment maintenance and repair were not established in written form.

- o Procedures for emergency treatment control (e.g., spills, power outages, high effluent TRC, etc.) were not established in written form.
- o An inadequate number of qualified operators has been provided by the Permittee to operate the plant. Also, during times of leave of the Permittee's operator, there would be no qualified backup operator. **Insufficient qualified operator(s) is a repeat finding** (2011 CEI Report).

Additional Notes: Permittee's WWTP operator had recently obtained certification, but indicated that he did not have the sufficient level of certification required under the State of New Mexico Utility Operator Certification Program. More information for the Utility Operator Certification Program (UOCP) that administers Water and Wastewater Operators at all public water and wastewater utilities in New Mexico is available at <a href="https://www.env.nm.gov/swqb/UOCP/">https://www.env.nm.gov/swqb/UOCP/</a>. State of New Mexico utility operator certification regulations are available on-line at <a href="https://164.64.110.239/nmac/parts/title20/20.007.0004.pdf">https://164.64.110.239/nmac/parts/title20/20.007.0004.pdf</a>.

### Section D - Self-Monitoring - Overall rating of "Unsatisfactory"

### **Permit Requirements** for Self-Monitoring:

Part III.C.5 of the 2008 and 2015 Permit state:

- a. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.
- b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.
- c. An adequate analytical quality control program, including the analyses of sufficient standards, spikes and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.

#### **Findings** for Self-Monitoring

- Sampling and analyses has not been completed for public water system intake TDS for more than 1 year in order to calculate net TDS once per 3 months as required in Part I.A of the 2008 and 2015 Permits based on provided records.
- o Sampling and analyses had not been completed for influent BOD and TSS once per month in order that percent removal could be calculated per Part I.A of the 2015 Permit effective October 1, 2015. The samples must be collected over the same time period in order to accurately reflect the percent removal.
- o Additional findings for pH and TRC recordkeeping and monitoring are in Section F (Laboratory) of this report.

### Section E - Flow Measurement - Overall rating of "Unsatisfactory"

### **Permit Requirements**

Part I.A of the 2008 Permit required "instantaneous" once/week and the 2015 Permit requires flow measurement "instantaneous grab" once/day.

Flow measurement is subject to accuracy requirements in Part III.C.6 of the permits that state:

#### 6. FLOW MEASUREMENTS

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes.

## Findings for Flow Measurements

- O Under the 2008 Permit, various totalized readings in gallons throughout the month were used to estimate flow. Number of days in the month and time of day of readings varied. Therefore, the calculated flows were estimates. Reporting of estimated flow and loading calculations (e.g., lbs/day), or other monitoring data that does not meet the requirements of the permit would need to be noted comments of the DMRs or as otherwise directed by NetDMR staff. NetDMR has several "No Data Indicators (NODIs)" to indicate flagged or no data.
- No recent calibration of the weir, ultrasonic meter and recorder had been conducted. Flow measurement calibration check records to assure continued compliance as described by the Permittee's WWTP operator on the day of this CEI was requested, but the records were not provided following this CEI. No flow calibration or periodic check records is a repeat finding (2011 CEI Report).

#### Section F - Laboratory - Overall rating of "Unsatisfactory"

#### **Permit Requirements** for Laboratory

Part III.C.5.a of the 2008 and 2015 Permit states "Monitoring must be conducted according to test procedures approved under 40 CFR 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator."

## **Findings** for Laboratory

- Reviewed sampling and analyses recordkeeping for pH and TRC did not include analytical methods and techniques; results of analyses and calibrations; and times of analyses. Both time of sample collection and analysis is needed to verify that the monitoring met holding times in 40 CFR 136.3 Table II.
- o Permittee's contract laboratory did not provide method approval dates to verify that the use of USEPA approved analytical procedures in 40 CFR 136.3 were used.

<u>Additional Notes</u>: The method used for E.coli bacteria analysis on the contract laboratory report dated November 17, 2015 was Standard Method 9223B. Approved methods in 40 CFR 136.3 Table IA for E.coli (see Federal Register, Vol. 77, No. 97, Friday, May 18, 2012, Rules and Regulations) include Standard Methods 9223B-2004. SM 22<sup>nd</sup> Edition contains the 9223B-2004 approved method.

- o Quality control procedures were not adequate, for example:
  - Written sample collection and analytical procedures were not available.
  - Permittee did not have copies of pH and TRC approved methods for on-site monitoring of pH and TRC.

- Permittee WWTP Operator described that pH and TRC instruments were calibrated (buffer standards or spikes), but checks and equipment maintenance were not recorded.
- Duplicate samples were not submitted to contract laboratories as a check of sampling and analytical performance. According to EPA's NPDES Inspection Manual, "10 percent of the samples should be duplicated."

#### **Comment**

Permittee had not contracted with a commercial laboratory to conduct WET analytical testing under the 2015 Permit. Footnote 7 of Part I.A of the 2015 Permit states "The sample for the first WET test for Outfall 001 shall be taken during the period November 1 and April 30 during the first year of the permit." A 24-hour composite sample is also required. Early coordination with a laboratory contracted to conduct WET testing is often needed to ensure that Permit conditions (e.g., sample volumes, containers, preservation, test species, etc.) are met. During this CEI, this inspector recommended to Permittee representatives that the RW&SD start making arrangements for WET monitoring in the timeframe window required by the Permit.

## Section G - Effluent/Receiving Waters Observations - Overall rating of "Unsatisfactory"

## **Permit Requirements** for Effluent/Receiving Waters

In Part II of the 2008 Permit, TRC minimum quantification level (MQL) was 100 micrograms per liter ( $\mu$ g/L), and TRC effluent monitoring results above 100  $\mu$ g/L may not be reported as zero (0). In Part II of the 2015 Permit, the MQL for TRC was reduced to 33  $\mu$ g/L. In both the 2008 and 2015 Permits, Part I.A, the TRC effluent limitation is 0.011 mg/L (11  $\mu$ g/L).

In Part IA, E.coli bacteria daily max and 30-day Avg and limitations were 2507 and 548 cfu per 100 ml, respectively, in the 2008 Permit. E.coli bacteria daily max and 30-day Avg limitations were reduced to 940 and 206 cfu per 100 ml, respectively, in Part I.A of the 2015 Permit.

## **Findings** for Effluent/Receiving Waters

- o On September 23, 2015, an effluent TRC measurement of 0.34 mg/L (340  $\mu$ g/L) was recorded, above the 2008 MQL and exceeded effluent limitations.
- TRC measurements above 0.033 mg/L (33 μg/L) were recorded, above the 2015 MQL and exceeded effluent limitations on 16 days in October 2015 (daily max of 950 μg/L was recorded on October 29); 23 days in November 2015 (daily max of 1,110 μg/L was recorded on November 19); and 4 days in December 2015 as of the day of this CEI.
- o TSS and E.coli bacteria effluent exceedances have also occurred as summarized in Table 3 below.
- o NMED SWQB files contain a July 23, 2013 RW&SD letter with WET laboratory analytical report and results of a composite sample collected January 30 and 31, 2013. Summary results state "Outfall 001 passed for this testing period." A copy of the RW&SD letter and report is provided in Appendix D. Provided copies of records did not include this report. Documentation that the Permittee had submitted the passing WET results on a DMR was not readily available during or provided following this CEI.

**Table 3: Summary of Concentration Data from Provided Records** 

	pН	pН	BOD	BOD	TSS	TSS	E.coli	E.coli	TDS	TDS
	Min	Max	30-day Avg	7-day Avg	30-day Avg	7-day Avg	30-day Avg	Daily Max	30-day Avg	7 Day Avg
2008 Permit Limits	6.0	9.0	30	45	30	45	548	2507	Report	Report
Monitoring Frequency	1/mo	1/mo	1/mo	1/mo	1/mo	1/mo	1/mo	1/mo	1/3mo	1/3mo
Units	s.u.	s.u.	mg/L	mg/L	mg/L	mg/L	cfu/100 ml	cfu/100 ml	lbs/day	mg/L
JAN 2013	7.2	7.3	8.0	8.0	17.0	17.0	1046.2	1046.2	158	808
FEB	7.3	7.4	8.1	8.1	17.0	17.0	60.1	60.1		
MAR			12.0	12.0	21.0	21.0	770.1	770.1	152	913
APR			34.0	34.0	27.0	27.0	>2419.6	>2419.6		
MAY	7.2	7.5	8.3	8.3	10.0	10.0	>2419.6	>2419.6		
JUN	7.2	7.5	6.5	6.5	13.0	13.0	920.8	920.8	171	853
JUL	7.2	7.5	4.1	4.1	7.0	7.0	27.5	27.5		
AUG	7.3	7.4	4.6	4.6	15.0	15.0	>2419.6	2419.6		
SEP	7.3	7.4	4.2	4.2	4.0	4.0	12.1	12.1	178	823
OCT	7.34	7.76	3.0	3.0	18.0	18.0	25.9	25.9		
NOV	7.34	7.43	4.4	4.4	18.0	18.0	36.4	36.4		
DEC	7.35	7.4	6.5	6.5	26.0	26.0	>2419.6	>2419.6	124.9	713
JAN 2014										
FEB	7.33	749	18.0	18.0	50.0	50.0	1986.3	1986.3		
MAR	7.34	7.39	10.0	10.0	13.0	13.0	1732.9	1732.9	143	661
APR	7.51	7.6	6.6	6.6	5.0	5.0	517.0	517.0		
MAY	7.39	7.71	13	13	30	30	17.1	17.1		
JUN	7.54	7.65	15	15	36	36	613.1	613.1	108	721
JUL	7.51	7.71	4.4	4.4	6.0	6.0	160.7	160.7		
AUG	7.53	7.68	2.5	2.5	7.0	7.0	8.5	8.5		
SEP	7.73	7.81	5.2	5.2	11	11	206	206	121	661
OCT	7.44	7.8	3.3	3.3	8.0	8.0	26.9	26.9		
NOV			5.3	5.3	32.0	32.0	83.9	83.9		
DEC	7.25	7.51	2.0	2.0	<4.0	<4.0	7.4	7.4		
JAN 2015	7.34	7.54	3.0	3.0	<4.0	<4.0	8.6	8.6		
FEB	7.38	7.62	3.0	3.0	<4.0	<4.0	7.5	7.5		
MAR	7.42	7.78	2.6	2.6	9.0	9.0	4.1	4.1		
APR	7.2	7.59	5.7	5.7	<4.0	<4.0	3.1	3.1		
MAY	7.42	7.78	18.0	18.0	10.0	10.0	27.2	27.2		
JUN	7.36	7.62	3.4	3.4	<4.0	<4.0	5.2	5.2		
JUL			4.2	4.2	<4.0	<4.0	980.4	980.4		
AUG			4.3	4.3	<4.0	<4.0	770.1	770.1		
SEP	7.3	7.8	3.0	3.0	<4.0	<4.0	193.5	193.5		

Notes: Recorded exceedances are in red. E.coli bacteria results of >2419.6 cfu/100 ml were too high to count.

#### Section H – Sludge- Overall rating of "Unsatisfactory"

### **Permit Requirements** for Sludge

Part IV, Element 1, Section 1.A.1, General Requirements states:

The permittee shall handle and dispose of sewage sludge in accordance with Section 405 of the Clean Water Act and all other applicable Federal Regulations to protect public health and the environment from any reasonably anticipated adverse effects due to any toxic pollutants which may be present in the sludge.

In the Code of Federal Regulations at 40 CFR Part 503.9 (y): ...the placement of sewage sludge on land on which the sewage sludge remains for two years or less. In the Code of Federal Regulations at 40 CFR Part 503.16 and 503.26, Management Practices - Table 1, Frequency of Monitoring states Greater than zero, but less than 290 metric tons per 354 day period, frequency of monitoring shall be once per year.

## **Findings** for Sludge

- o Records of sludge management, land application or disposal were requested during the CEI, but were not available or provided. Improper sludge removal may be a factor in effluent permit limitation exceedances (Summarized above in Table 3). **This is a repeat finding.**
- Sludge was stockpiled in the middle drying bed. The Permittee WWTP Operator indicated that the RW&SD would need to dispose of accumulated sludge at an approved landfill. Any sludge mixed with soil at entrances to the drying beds would also need to be properly disposed.

**Need for proper sludge management is a repeat finding.** For example, a Sludge Reclamation Plan was a result from USEPA's compliance order CWA-06-2011-1774.

Additional Sources of Information: USEPA's web site with information on biosolid regulations is available at <a href="http://www.epa.gov/biosolids">http://www.epa.gov/biosolids</a>. During the exit interview of this CEI, this Inspector recommended to Permitee representatives that the RW&SD contact solid waste disposal facilities to find out landfill disposal requirements. More information on solid waste and disposal requirements is available at NMED Solid Waste Bureau web site at <a href="https://www.env.nm.gov/swb/">https://www.env.nm.gov/swb/</a>. A list of New Mexico landfills permitted to accept special waste or sludge (updated 8.20.15) is available at:

https://www.env.nm.gov/swb/documents/8.20.15SpecialWasteLFCorrected.pdf.

NMED/SWQB Official Photograph Log Photo # 1					
Photographer: Erin S. Trujillo Date: 12/21/2015 Time: 1358 hours (camera had not been updated for time change)					
City/County: Ramah / McKinley County  State: New Mexico					
Location: Ramah Water and Sanitation District (RW&SD), WWTP, NPDES Permit No. NM0023396					
Subject: Plant's aeration mixer was operating.					



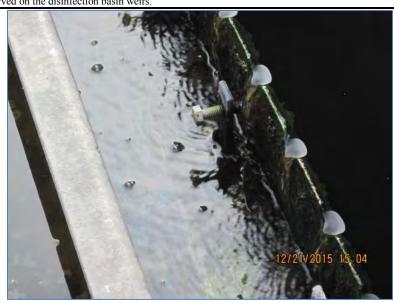
NMED/SWQB Official Photograph Log Photo # 2					
Photographer: Erin S. Trujillo Date: 12/21/2015 Time: 1359 hours (camera had not been updated for time change)					
City/County: Ramah / McKinley County  State: New Mexico					
Location: Ramah Water and Sanitation District (RW&SD), WWTP, NPDES Permit No. NM0023396					
Subject: Arrow points to accumulated sludge in secondary clarifier intake. Sludge was near the top of the containment with little free board remaining.					



NMED/SWQB Official Photograph Log Photo # 3					
Photographer: Erin S. Trujillo Date: 12/21/2015 Time: 1400 hours (camera had not been updated for time change)					
City/County: Ramah / McKinley County  State: New Mexico					
Location: Ramah Water and Sanitation District (RW&SD), WWTP, NPDES Permit No. NM0023396					
Subject: Floating solids and algal growt	h on the exit weir of secondary clarifier was observed	l.			



NMED/SWQB Official Photograph Log Photo # 4						
Photographer: Erin S. Trujillo Date: 12/21/2015 Time: 1404 hours (camera had not been updated for time change)						
City/County: Ramah / McKinley County State: New Mexico						
Location: Ramah Water and Sanitation District (RW&SD), WWTP, NPDES Permit No. NM0023396						
Subject: Algal growth was observed on the disinfection basin weirs.						



NMED/SWQB Official Photograph Log Photo # 5					
Photographer: Erin S. Trujillo Date: 12/21/2015 Time: 1406 hours (camera had not been updated for time change)					
City/County: Ramah / McKinley County  State: New Mexico					
Location: Ramah Water and Sanitation District (RW&SD), WWTP, NPDES Permit No. NM0023396					
Subject: Flow measurement weir. Arrow points to effluent entering pipe that discharges to the outfall.					



ad not been



NMED/SWQB Official Photograph Log Photo # 7					
Photographer: Erin S. Trujillo Date: 12/21/2015 Time: 1408 hours (camera had not been updated for time change)					
City/County: Ramah / McKinley County  State: New Mexico					
Location: Ramah Water and Sanitation District (RW&SD), WWTP, NPDES Permit No. NM0023396					
Subject: Stockpiled sludge stored in middle sludge drying bed.					



NMED/SWQB Official Photograph Log Photo # 8					
Photographer: Erin S. Trujillo	Date: 12/21/2015	Time: 1408 hours (camera had not been updated for time change)			
City/County: Ramah / McKinley County  State: New Mexico					
Location: Ramah Water and Sanitation District (RW&SD), WWTP, NPDES Permit No. NM0023396  Subject: West sludge drying bed. Arrows point to some vegetation and wooden board to allow entrance with what appears to be sludge mixed with soil outside the bed.					



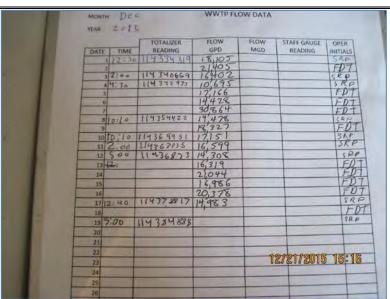
NMED/SWQB Official Photograph Log Photo # 9					
Photographer: Erin S. Trujillo	Date: 12/21/2015	Time: 1412 hours (camera had not been updated for time change)			
City/County: Ramah / McKinley County State: New Mexico					

Location: Ramah Water and Sanitation District (RW&SD), WWTP, NPDES Permit No. NM0023396

Subject: Example Wastewater Treatment Plant Log (December 2015). Log shows effluent chlorine and pH measurements. Permittee WWTP Operator stated that the units for TRC on the log were in mg/L. Log does not include monitoring methods or analytical times to confirm TRC and pH monitoring met holding times. Log indicates TRC results ranged between 0.00 and 0.16 mg/L (160 µg/L).



	NMED/SWQB Official Photograph Log Photo # 10	
Photographer: Erin S. Trujillo	Date: 12/21/2015	Time: 1416 hours (camera had not been updated for time change)
City/County: Ramah / McKinley County		State: New Mexico
Location: Ramah Water and Sanitation D	strict (RW&SD), WWTP, NPDES Permit No. NM	10023396
Subject: Example WWTP Flow Data log (recorded.	December 2015). Time of totalizer readings varied	d. Time of totalized flow (Flow GPD) measurement was not



## Appendix A – USEPA Compliance and Enforcement Staff and NMED Contacts

NPDES current enforcement contact for Ramah Water & Sanitation District:

Damon McElroy, USEPA R6 (CAED), 214-665-7159, mcelroy.damon@epa.gov

NPDES permit writer for Ramah Water & Sanitation District:

Isaac Chen, USEPA R6, NPDES Writer, 214-665-7364, chen.isaac@epa.gov

NPDES non-compliance reporting:

Gladys Gooden-Jackson
US Environmental Protection Agency
Region VI (6EN-WC)
Lead EPS, New Mexico State Coordinator
NPDES Compliance Monitoring Section
Water Enforcement Branch
Compliance Assurance and Enforcement Division
1445 Ross Avenue
Dallas, TX 75202-2733
(214) 665-7494 (Office)
(214) 665-2168 (FAX)
gooden-jackson.gladys@epa.gov

#### NPDES NetDMR

Helen Nguyen
NetDMR & ICIS-NPDES Coordinator (6EN-WC)
NPDES Compliance Section
Water Enforcement Branch
Compliance Assurance and Enforcement Division
214-665-6458 (Office)
214-665-2168 (Fax)
nguyen.helen@epa.gov

<u>Note</u>: More information on USEPA electronic reporting using NetDMR is available at <a href="https://netdmr.epa.gov/netdmr/public/home.htm">https://netdmr.epa.gov/netdmr/public/home.htm</a>. If there are questions about NetDMR (e.g., activate and update current staff in the system for electronically submitting and certifying reports), the Permittee representatives can contact <a href="mailto:nguyen.helen@epa.gov">nguyen.helen@epa.gov</a>. Also, USEPA announced monthly NetDMR webinar training sessions for NPDES Permittees starting January 27, 2016. News, announcements and training links are available at <a href="https://netdmr.zendesk.com">https://netdmr.zendesk.com</a>.

NMED contact for copies of written reports/correspondence to USEPA, as required in the Standard Conditions of NPDES Permits:

Bruce J. Yurdin Program Manager, Point Source Regulation Section Surface Water Quality Bureau New Mexico Environment Department 1190 South St. Francis Drive, Rm N2050 Santa Fe, NM 87502

## Appendix B -Additional USEPA Guidance on Calculations

## **Loading**

Effluent loadings are calculated using daily effluent flow and daily analytical data. Flow record keeping needs to include sufficient information for the daily flows on the day of sample collection. USEPA Region 6, NPDES Reporting Requirements Handbook, Revised August 25, 2004 states:

#### Reporting of Loadings

Some parameters in the permit are limited in terms of pounds per day (lbs/day). Although all of these parameters are measured initially in milligrams per liter (mg/L), conversion to lbs/day can be achieved by using the following formula. Always be sure to use the flow measurement determined on the day when sampling was done.

Flow on day of sampling (MGD) x concentration (mg/L) x 8.34 (lbs/gal) = Loading (lbs/day)

Where: MGD = Million Gallons per Day

## **Flow Weighted Composite Samples**

NPDES Storm Water Sampling Guidance Document, July 1992, EPA 833-B-92-001, Pages 75-81, http://www3.epa.gov/npdes/pubs/owm0093.pdf

# Appendix C – Provided Copies of Paper DMR Records

Note: Documentation that the following DMRs were received and accepted by USEPA was not readily available during or provided following this CEI. Findings on the following copies of paper DMRs are in Section B of this Report.

PERMITTEE NAME/ADDRESS (Include Facility Nemo-Location & Different)
NAME RAMAH WATER & SANITATION DISTRICT ADDRESS

P.O. Box 416 Ramah, NM 87321

LOCATION McKinley County, NM

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16)
(17-19)

Form Approved. OMB No. 2040-0004 Approval expires 05-31-98

OO / DISCHARGE NUMBER YEAR MO DAY YEAR MO MONITORING PERIOD NM 00 23396 PERMIT NUMBER FROM 2013 (1)

Check here if No Discharge

NOTE: Read Instructions before

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EPA Form 3320-1 (10-96)

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DISCHARGE MONITORING REPORT (DMR)
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NAME RAMSH Water & Sonitation District
ADDRESS P.O. Box 416
RAMSH 87321

NM do 23396 PERMIT NUMBER

MONITORING PERIOD FROM 13 03

OO / DISCHARGE NUMBER

Form Approved, OMB No. 2040-0004 Approval expires 05-31-98

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DISCHARGE MONITORING REPORT (DMR)
(17:19) PERMITTEE NAME/ADDRESS (Include Facility Numer Cocation # Different)
NAME RAMAH WATEN & SANITATION DISTVICT P.O. BOX 416 ADDRESS

87321

Ramah, NM

FACILITY LOCATION

NM 0023396 PERMIT NUMBER

000 MONITORING PERIOD

DISCHARGE NUMBER

YEAR MO DAY

Form Approved. OMB No. 2040-0004 Approval expires 05-31-98

NOTE: Read Instructions before completing this form Check here if No Discharge

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Ramah, KM 87321

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
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Form Approved. OMB No. 2040-0004 Approval expires 05-31-98

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PARAMETER (32-37)	$\setminus$	(3 Card Only) QU/ (46-53)	UANTITY OR LOADING (54-61)	۷G	(4 Card Only) (	OUALITY OR CONCENTRATION (46-53)	ENTRATION (54-61)		Š.	FREQUENCY	SAMPLE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS	6	ANALYSIS (64-68)	TYPE (69-70)
Flow	SAMPLE	1,20	920.	CAN	AIA	AlA	1/4	=		13/20	Inct
50050	REQUIREMENT	REPORT	REPORT					#		3/10/2	Inst
Bob	SAMPLE MEASUREMENT	2	1.6	Ilas	A. A.	200	1. 1.		2	2 2	
06310	PERMIT REQUIREMENT	14.5	21.7	10		30	7 7	2/-	1 2		000
755	SAMPLE MEASUREMENT	1.9	6.1	1/40/	NA	101		4	1		27.1
00530	PERMIT REQUIREMENT	14.5	21.7	10	+	30	42	200	)	1/20	2000
TRC	SAMPLE MEASUREMENT	-	NA		NA	NA	5 0		0	19/21	<b>J</b>
5 8060	PERMIT						5 =	167		1/1	1900
E.coli Bacteria	SAMPLE MEASUREMENT	AN	XX		XX	2414	51110	1	1	1/20/	الإ
51040	PERMIT REQUIREMENT					548	2507	2		12/20	12/2/2
Hd	SAMPLE MEASUREMENT	A/A	4W		719	A/A	755	and t	2	171	0 140
00400	PERMIT REQUIREMENT				0.9		9.0	5.4.	1	1/20	27.0
7.05	SAMPLE MEASUREMENT	NiA	NA	Ibst	NA N	XX	N/A	3	2	Will W	
70296	PERMIT REQUIREMENT	REPORT		10	7.00		RPPORT	1 Mg/	)	33	3
NAME III LE PHINCIPAL EXECUTIVE OFFICER	OFFICER ICERTIF	ICERTIFY UNDER PENALTY OF LAW THU UNDER MY DIRECTION OR SUPERVISH THAT QUALIFIED PERSONNEL PROPER	NT THIS DOCUMENT AND ALLY ON IN ACCORDANCE WITH A RICH AND EVALUATE	ATTACHMENTS WERS	PREPARED TO ASSURE	. 1.		TELEPHONE	ONE	605	OATE DATE
Kobert Cain		PERSONS DIRECTLY RESPONSIBLE SUBMITTED B. TO THE DEST OF MY IN AM AWARE THAT THERE ARE SIGNII IN S. C. C. CONTROLL SUBMITTY OF FINE	ERBON ON PERBONS WHO MANIGE THE SYSTEM, OR THOSE SILE FOR GATHERING THE INFORMATION, THE INFORMATION ON THE INFORMATION ON THE INFORMATION ON THE INFORMATION ON THE STATE AND COUNTE THE ONE SEED SHAD THIS OF A SHAD STATE AND COMPLETE THE AND THE MAY MAPHED INFORMET FOR INDOMINITION FALLE EINFORMATION. SHE'T BIVE AND WORLD SHE'S SHE THE SHAD THE SHE SHE SHE SHE SHE SHE SHE SHE SHE S	NAGE THE SYSTEM DRMATION, THE INI JE, ACCUPATE, AND SMITTING FALSE INF KNOWING VIOLATIO		RC	-	_			
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	NOCALIONS	o (Merence all attac	achments here)								+

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) (17-19) PERMITTEE NAME/ADDRESS (Include Facility Name) Committee Name Ramah Water & Sanitation District

ADDRESS P.O. BOX 416
Ramah, NM 87321

LOCATION McKinley County, NM

OO / DISCHARGE NUMBER NM 00 23396 PERMIT NUMBER

MONITORING PERIOD 10 FROM 13 06 01

Check here if No Discharge

Form Approved, OMB No. 2040-0004 Approval expires 05-31-98

NOTE: Read Instructions before

PARAMETER (32-37)	$\setminus$	(3 Card Only) QU/ (46-53)	QUANTITY OR LOADING (54-61)	LOADING (4	Card Only) (38-45)	(15 57) (20-53) (30-51)  hy) QUALITY OR CONCENTRATION (46-53)	NTRATION (54-81)		NO.	FREQUENCY	SAMPIE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	PLINIT	=	ANALYSIS	TYPE
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BAN	SAMPLE	_	11- ruk!			\	\		1	N.K	1,115
COD	WEASON EMEN	( )	(- )	1601	NA	62	6.7	Š	0	INO	کر از از ا
00 310	REQUIREMENT	14.5	21.7	19		30	45	E/	1 01	1/200/	これで
755	SAMPLE MEASUREMENT	2.6	2.6	1841	AA AA	13	13		0	1/2011	
00530	PERMIT REQUIREMENT	14.5	21.7	10		30	44	2		1	2 5
TRC	SAMPLE MEASUREMENT		XX		NA	AN			2	17/2	Shal
5 2060	PERMIT REQUIREMENT						) =	767		0//	030
E. coli Bacteria	SAMPLE MEASUREMENT	47	XX		AN	2 MM (3)	0 7 × 10 20	1	3	1200	Grab
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00400	PERMIT REQUIREMENT	1/2/	11 21		0.0	7/	02.70	5.4.	2	and !	0000
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COMMENTS AND FXPI ANATION OF ANY VIOLATIONS AND STORES. § 1510, (Februles under these contract the contract of	or maxim	um imprisonment of between 6 m	(Penalties under these stalutes of months and 5 years.)	NOWING VIOLATIC		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AL EXECUTIVE ZED AGENT	AREA NI IN	NIMBER	VEAR	MO
	ON A PORTALIONS	(Helerence all attac	hments here)			5.1		1		_	_

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) PERMITTEE NAME/ADDRESS (Include Facility Numal cocation if Different)
NAME RAMAH Water & Sanitation District

P.O. BOX 416 ADDRESS

County, NM 87321 Ramah, NM McKinley

FACILITY LOCATION

FROM

MONITORING PERIOD NM 00 23396 PERMIT NUMBER YEAR MO

OO / DISCHARGE NUMBER

Form Approved. OMB No 2040-0004 Approval expires 05-31-98

NOTE: Read Instructions before completing this form Check here if No Discharge

13 Grab 1/mo Grab (Sex) Grab Grab (GR. 7) 12/mo Gas 1 Sab Imo Gab Ino Grab Imo Grab Inst Inst 2 (69-70)9/10 mo 3/WK /mo NO. FREQUENCY OF (62-63) (64-68) 100 1/mo OMO NA 0 J TELEPHONE CFU 10001 16m S.G. 16W UNITS MON क्र REPORT 2507 MAXIMUM 7.50 77.5 QUALITY OR CONCENTRATION ASS NIA 9.0 45 7 AVERAGE 548 X 27.5 4 X 1 /7 30 (28-27) (28-29) (30-31) 30 MINIMOM 44 SA かな NA (4 Card Only) (38-45) 0.9 NA LIEF TRUE ACCUPATE, AND COMPLETE.
TOPI SUBMITTING FALSE INFORMATION,
INT FOR KNOWING VIOLATIONS, SEE 16
stelldes may include fines up 15 \$10,000 and (20-21) (22-23) (24-25) MGD UNITS 1601 165/ 1691 QUANTITY OR LOADING (54-61) REPORT MAXIMUM 21.7 イイ 4 ru 77 0 REPORT REPORT AVERAGE 4 0.025 14.5 14.5 7 (3 Card Only) (46-53) サユ XX PERMIT REQUIREMENT SAMPLE SAMPLE PERMIT REQUIREMENT PERMIT REQUIREMENT PERMIT PERMIT SAMPLE MEASUREMENT SAMPLE MEASUREMENT SAMPLE MEASUREMENT SAMPLE MEASUREMENT SAMPLE MEASUREMENT PERMIT REQUIREMENT PERMIT REQUIREMENT NAME/TITLE PRINCIPAL EXECUTIVE OFFICER E. coli Bacteria PARAMETER (32-37) 51040 00400 50050 00530 70296 KODOR 06310 105 Flow 50060 TRC Hd BOD 755

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

YPED OR PRINTED

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DAY

8

YEAR

NUMBER

AREA

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLITANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) (17-19) PERMITTLE NAME/ADDRESS (Include Facility Name/Localion II Dilloceni)
NAME Ramah Water & Sanitation District
ADDRESS P.O. Box 416
Ramah, NM 87321

LOCATION McKinley County, WM

MONITORING PERIOD NM do 23396 PEPMIT NUMBER FROM 2013 08

OO / DISCHARGE NUMBER

Form Approved. OMB No. 2040-0004 Approval expires 05-31-98

Check here if No Discharge

NOTE: Read Instructions befo

NO. FREQUENCY	EX ANALYSIS	C	01/	3/WK Inst	1. 6	mo h	7/1	mg/ Office	1 (9)		1/1/2/1/20	CFY O mo crab	2507 100ml Mrs Grab	1	5.u. 7	N.A.	T mg/	TELEPHONE DATE	
QUALITY OR CONCENTRATION (48-53)	AVERAGE	417	MA		1,6	30	7	30	NA	Z A	74.19	1117	548	M/M		MA		0 01	SIGNATION OF THE OF
(4 Card Only) (38-45)	MINIMUM	N. N	3		4		4)4	Val.	NA		A . A	しい		7.31	0.9	NAN		VERE PREPARED NED TO ASSURE THO BURNITIED	
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(54-61)	MAXIMUM	037	0 7 0	NEFORT		21.7	3,25	21.7	NA		AIA	100		NA		NA NA	119 PE	N THIS DOCUMENT AND ALL  N IN ACCORDANCE WITH A  ILY GATI TER AND EVALUATE  ON OR PERSONS WHO MA	AOWLEDGE AND BELIEF THE WORLD BELIEF THE STORY SOLVED FOR SURFAMENT FOR SURFAMENT FOR SHAMES.
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X		SAMPLE MEASUREMENT	PERMIT	SAMPLE	MEASUREMENT	PERMIT REQUIREMENT	SAMPLE MEASUREMENT	PERMIT REQUIREMENT	SAMPLE MEASUREMENT	PERMIT REQUIREMENT	SAMPLE	PERMIT	HEOUIREMENT	MEASUREMENT	PERMIT REQUIREMENT	SAMPLE MEASUREMENT			SUBMITTE I AM AWA INCLUDIM U 8.C. 5 10
(32-37)		Flow	50050		BOD	00 310	755	00530	TRC	50000	E. coli Bacteria	21040		Hd	00400	705	NAME/TITLE PRINCIPAL EXECUTED	7 + 70	TYPED OB PRINTER

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16)
(17-19) PERMITTEE NAME/ADDRESS (Include Facility Name Location of Dilborn)
NAME Ramah Water & Sanitation District
ADDRESS Po. Box 416
Ramah, NM 87321

LOCATION McKinley County, NM

MONITORING PERIOD NM do 23396 PERMIT NUMBER

YEAR MO DAY

FROM

DISCHARGE NUMBER 100

Form Approved. OMB No. 2040-0004 Approval expires 05-31-98

Check here if No Discharge

NOTE: Read Instructions before

NOTE: Read Instructions before completing this form	QUALITY OR CONCENTRATION (46-53) (46-53) (16-53)	EX MAXIMUM LINITS (62-63) ANALYSIS	(04-00)	2) 10.0		4.6 mg 0 mg 6625	30 45 1 mo Grab	U C/ C 71 Vini	and of the same	1100	16n 16n	7.	12.1 CFU, 0 1/m Gas	548 2507 Jan	7.19	5.4.	1,00	265 mg/ 0 15m0 Gab
27	(4 Card Only) QUALITY O (4 (38-45)	UNITS MINIMUM AVE	W. N. C. C.	M(51) MA		100 NA	6	(hs) NA 4.		N.A.			71 +12	5	72)			
(20-21) (22	(54-61)	MAXIMUM	0.026	Ar ono T	200	5	21.7	0.0	21.7	AA		7	tax		4/4		NA NA	
	) [	AVERAGE	SAMPLE O.025	REQUIREMENT RP. DAD T	SAMPLE CAMPLE CAMPAGE	13	REQUIREMENT 14.5	MEASUREMENT C, G	REQUIREMENT 14.5	SAMPLE MEASUREMENT NA	PERMIT REQUIREMENT	SAMPLE MEASUREMENT		REQUIREMENT	SAMPLE MEASUREMENT	PERMIT REQUIREMENT	SAMPLE 175	REQUIREMENT A FORT
DADAMETER	(32-37)		FLOW	0	MEA MEA		0	755 MEA	00 530 REC	TRC MEA	5 0060 REC	E. Coli Bacterio	-		p H	00400 REC	TOS	70296 REC

EPA Form 3320-1 (10-96)

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16)
(17-19) PERMITICE NAME/ADDRESS (Include Facility Name Location of Different)

NAME RAMAH Water & Sanitation District ADDRESS P.O. BOX 416
Ramah, NM 87321

Form Approved, OMB No. 2040-0004 Approval expires 05-31-98

OO / DISCHARGE NUMBER NM 0023396 PERMIT NUMBER

MONITORING PERIOD 10 01 TO DAY FROM 13 10

10   10   17   10   17   10   17   10   17   10   17   10   17   10   17   10   17   10   17   10   17   10   17   10   17   10   10	M. 11 11 81321		521	YEAR	QM	ORING		Check here if No Discharge				
March   Marc	Kin ley	County		FROM 13 (20-21)	(22-23) (24-2	5	MO DAY (0 3/	NOTE: Read Ins	tructions before	э сотріві	ting this fo	£
WG   MINIMUM   AVERAGE   MAXIMUM   UNITS   CE-451   CE-	TER )	$\times$	٥	ANTITY OR LOADII (54-61)	NG		DUALITY OR CONCE	ENTRATION (54-61)		- 1	REQUENCY	- 1
14   MGD   MA   MA   MA   MA   MA   MMK   MMKK   MMK   MMKK			AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	STINIT	EX (62-63)	ANALYSIS	
		SAMPLE MEASUREMENT		6.024	(1)	NIN	717	7/7			(04-00)	(69-70)
165 NA 30 45 1 mg 0 mg		PERMIT REQUIREMENT	100	REPORT	100	U A	E N	WA				1/37
185   WA   16   18   180   170   1		SAMPLE MEASUREMENT		0.6	1	Will	21	100		0	/ WK	1817
		PERMIT REQUIREMENT		21.7	2/0	LAN .	30	י ל	m 6/-		0.4	0/20
10		SAMPLE MEASUREMENT		3.6	160	474	7/	1 1	1/		2 /20	Grab
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128 NAME TO SOUTH TO SOUTH TO SOUTH TO SOUTH THE INFORMATION T	0	PERMIT REQUIREMENT					540	011.6	<u> </u>	2	011	365
1650 WA N.A M.A M.A M.A M.A M.A M.A M.A M.A M.A M		SAMPLE MEASUREMENT	1/4	411		774	0.10	200	1		Imo	64ab
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165 NA NA NA NA M9 0 1/3 m0 1/		SAMPLE	224			6.0		9.0	5.4.		mo	Grab
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WOULD ATTICHMENTS WERE PREMIED  WITH A SYNCH WE HER PAINTED  WITH A SYNCH WE HER POWNER  WITH A SYNCH WE HER POWNE	AL EXECUTIVE	REQUIREMENT	REPORT		9			Repor	3.1		W.	
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All TOTS NOWING THOSE UP IN STREET OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT OFFICER OR AUTHORIZED AGENT OFFICER OR AUTHORIZED AGENT OFFICER OR AUTHORIZED AGENT			9 DRECTLY RESPONSIBLE FEED IS, TO THE BEST OF MY KN ARE THAT THERE ARE SIGNIF VQ THE POSSIBLE ITY OF PINE	FOR GATHERING THE INFO NOWLEDGE AND BELIEF TRU FOWL PENALTIES FOR SUB	WAGE THE SYSTEM, DAMATION, THE INF IE, ACCURATE, AND I	OR THOSE ORMATION SOMPLETE OFWATION						
	LANATION OF	ANY VIOI ATIONS	un imprisonment of between 6 m	analises under these statutes months and 5 years.	CNOWING VIOLATION  By Include fines up to		INATURE OF PRINCIP OFFICER OR AUTHOR	AL EXECUTIVE IZED AGENT		A PCB	VEAR	-

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(17.19) PERMITTEE NAME/ADDRESS (Include Facility Name/Location # Different)
NAME RAMSH Mater & Sanitation District P.O. Box 416 Ramah, NM 87321

NM 00 23396

OO / DISCHARGE NUMBER MONITORING PERIOD P FROM 13 11 01 PERMIT NUMBER

Form Approved. OMB No. 2040-0004 Approval expires 05-31-98

No Kin 1011	7	1 1 10 1	1000		T	NO CAL	000	70			
" 1c y	MN County, NM		FROM 7 (20-21)	(22-23) (24-25)	10	13   11   30 (28-27) (28-29) (30-31)	NOTE: Read Instructions before completing this form	uctions before	eldmoo e	ifing this fo	Æ
РАНАМЕТЕН (32-37)	X	ō l	UANTITY OR LOADING (54-61)		(4 Card Only) ( (38-45)	QUALITY OR CONCENTRATION (46-53)	NTRATION (54-61)		Ö.	FREQUENCY	SAMPLE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS	-	ANALYSIS (64-68)	TYPE (69-70)
	MEASUREMENT	0.017	2700	MGD	NA	K/A	1/4		0	13/20	Tost
	REQUIREMENT	REPORT	REPORT							3/20	Inst
	SAMPLE MEASUREMENT	0.0	0.0	Ila	A.(A	11/2	hh		<	2 2 2	
	PERMIT REQUIREMENT	14.5	21.7	1/0		30	45	m/2	)		2000
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	PERMIT REQUIREMENT	14.5	21.7	6		30	45	1		2	22.1
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	PERMIT REQUIREMENT						11	र्दू	)	1,	0140
E.coli Bacteria	SAMPLE MEASUREMENT	AV	AN	177	AN	478	26.2	1	1	1/20	<u> </u>
51040	PERMIT REQUIREMENT					248	2500	12/2	2	1/200	020
	SAMPLE MEASUREMENT	NA	4N		7.34	NA	743	10001	0	1	3/mo Grab
	PERMIT REQUIREMENT				6.0	100	9.0	5.4.		7	2 2 2
	SAMPLE MEASUREMENT	NA	NA	Ibst	NA	XX	NA			7	
NAME/III E PRINCIPAL EXECUTANCE OFFICE TO SERVER TANKER OF THE PRINCIPAL EXECUTANCE OF	310	AEPORT		10			REPORT	6W -		330	
2	-	LOERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A THAT CALLIFED PERSONNEL PROPERLY GATHER AND EVALUATE BASED ON MY INCHIRY OF THE PERSON OF BEDERMAN	ATTHIS DOCUMENT AND ALL A'S IN IN ACCORDANCE WITH A SALY DATI SER AND EVALUATE TO SOLVE OF SERVICES AND EVAL	ATTACHMENTS WERE PREPARED SYSTEM DESIGNED TO ASSURE THE INFORMATION SUBMITTED	E PREPARED TO ASSURE SUBMITTED.	1		TELEPHONE	NS.		DATE
Cain		PERSONS DIRECTLY RESPONSIBILE TO SUBMITTED IS 10 THE BEST OF MY NOV I AM AWARE THAT THERE AS IS INCLUDING THE POSSIBILITY OF FINE U.S.C. \$ 1001 AND 32 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1001 AND 33 U.S.C.	LE FOR GATHERNIG THE INFORMATION INFORMATION THE INFORMATION INFORMATION INFORMATION FALSE INFORMATION FALSE INFORMATION FALSE INFORMATION FALSE INFORMATION SEE IN PROMISE INFORMATION FALSE INFORMATION SEE	MAGE THE SYSTEM PRIMATION, THE IN PE, ACCURATE, AND MITTING FALSE IN CNOWING VIOLATIC		Mich					
TYPED OH PHINIED	or maxim	O Maximum imprisonment of between 6 months and 5 years)	Nonth's and 5 years.)	By Include fines up I:		SIGNATURE OF PRINCIPAL EXECUTIVE	AL EXECUTIVE 1				

PAGE

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) PERMITICE NAME/ADDRESS (Include Facility Name/Location # Different)

NAME Ramah Water & Sanitation District
ADDRESS P.O. Box 416

Ramah, NM 87321

LOCATION MCKINley County, NIM

MONITORING PERIOD NM do 23396 PERMIT NUMBER YEAR MO DAY FROM

OO / DISCHARGE NUMBER

Form Approved. OMB No. 2040-0004 Approval expires 05-31-98

Check here if No Discharge

NOTE: Read Instructions before

	1		(20-21)	(20-21) (22-23) (24-25)		(28-27) (28-29) (30-31)	NOTE: Neud Instructions before completing this form	Jelions before	e comple	ating this to	£
(32-37)	X	(46-53)	(54-61)	<b>5</b>	(4 Card Only) Q (38-45)	QUALITY OR CONCENTRATION	NTRATION (54-61)		NO.	FREQUENCY	SAMPLE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	STING	EX (62-63)	ANALYSIS	TYPE
Flow	SAMPLE MEASUREMENT	0.021	0.021	((2))	AIA	41,	7/1		5	13/20	(0/-so)
50050	PERMIT REQUIREMENT	Report	REDNOT		470	NA	WA		2	37	1 1/2
Bon	SAMPLE	_	(,	1	8	7/	7		(	/WK	1847
00310	PERMIT	14.5	21.7	12	M	90	9 5	2 × ×	2		G/20
755	SAMPLE	246	97		4)4	77	מיי	1	-	- 1	Grab
00530	PERMIT REQUIREMENT	14.5	21.7	2/2	421	97	75	mg/	2	1 (20)	ORD.
TRC	SAMPLE MEASUREMENT		NA		NA	978	CT	7		1/2/	Grab
50060	PERMIT REQUIREMENT					2 2	) =	den	7	2	010
E. coli Bacteria	SAMPLE MEASUREMENT	47	48		WA	24/19	7419	.1	5	1/20	Grab
51040	PERMIT					5110	11.5	C.F.C		2 /s	000
Ha	SAMPLE	7/1	017		12%	0.10	2008	70001	-	mo	Grab
00400	PERMIT	NA	74		(. 37	XX	240	· · ·	0	04/	626
007.00	CAMBILL				0.9		9.0	5.4	1	1/20	Grab
TDS	MEASUREMENT	124.9	NA	1891	NA	NA	713	144	0	1/3/10	
70296 NAME/TITLE PRINCIPAL EXECUTIVE	REQUIRE	AEPORT		9			REPORT	57		13	
7		CELLIFY DOZER PENALTY OF LAW THA UNDER MY DIRECTION CR SUPERVISIO THAT GUALIFIED PERSONNEL PROPER BASED ON MY INQUIRY OF THE PERSO	HAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED SION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE PREVAILED FOR LYPE THE INFORMATION BUSANITTED.	TACHMENTS WER YSTEM DESIGNED HE INFORMATION	E PREPARED TO ASSURE BUBMITTED.	1		TELEPHONE	NS NS		DATE
LODOL COL		PERSONS DIRECTLY RESPONSIBLE: SUBMITTED IS, TO THE BEST OF MY KN I AM AWARE THAT THERE ARE BIGHT IN OUTUNING THE POSSIBILITY OF FINE US G. § 1001 AND 50 US G. § 1319. [P.	LE FOR CATHERNIA WEN MANABEL THE SYSTEM, OR THOSE TO WINDOWARDON, THE INFORMATION THE INFORMATION THE INFORMATION WINDOWARD THE INFORMATION WINDOWARD FOR SHIP FOR USE WINDOWARD FOR SHIP FOR WINDOWARD FOR SHIP FOR WINDOWARD FOR SHIP FOR WINDOWARD WOLKTONE, SEE 18 (Panalles under those ship for Knowning Volations, SEE 18	MATION, THE IN ACCURATE AND MITTING FALSE IN MOWING VIOLATE			,				
COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Defenced of the control of the contro	ANY VIOLATIONS	un imprisonment of between 6 m	6 months and 5 years.)	y meadon innes up i		OFFICER OR AUTHORIZED AGENT	1	AREA	NUMBER	YEAR	MO DAY
		печененсе ан апас	achments here)					1			7

NATIONAL POLLUTAN, JISCHARGE ELMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16).

PERMITTER NAME/ADDRESS (Include Facility Name, Location II cilleren)
NAME Ramah Water & Sanitation District Ramah, NM 81321 P.O. BOX 416

ADDRESS

FACILITY MCKINIEY COUNTY, NIM

OO / DISCHARGE NUMBER NM 00 23396

PERMIT NUMBER

MONITORING PERIOD

Ø.

YEAR 14

YEAR | MO |

FROM

2

Form Approved. OMB No. 2040-0004 Approval expires 05-31-98

Check here if No Discharge

NOTE: Read Instructions before completing this form

<i>(</i>			(20-21)	(20-21) (22-23) (24-25)		(26-27) (28-29) (30-31)			-	3	
PAHAMETER (32,37)	$\geq$	(3 Card Only) QUA (46-53)	ANTITY OR LOADING (54-61)		(4 Card Only) QU (38-45)	QUALITY OR CONCENTRATION (46-53) (54	TRATION (54-61)		S.	FREQUENCY	SAMPLE
(10.30)		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS	-	ANALYSIS (84-68)	(69-70)
Flow	SAMPLE MEASUREMEN	SAMPLE MEASUREMENT 0.02 Z	0.00%	COM	NA	NA	NA	(19)	13	3/00/	Inst
50050	PERMIT REQUIREMENT	1 REPORT	REPORT	404				3		3/wK	Inst
Bon	SAMPLE		23	lhs.	AN	18	18	Š	0	1/40	Grah
063/0	PERMIT REQUIREMENT	7 14.5	21.7	19		30	45	1	F 50 3	mo	Grab
755	SAMPLE MEASUREMENT	7.5	7.5	[65]	AA	50	50	ma/	~	(m)	20.75
00 530	PERMIT RECUIREMENT	14.5	21.7	6		30	45	1		/mo	Grab
TRC	SAMPLE MEASUREMENT	TI NA	NA		NA	NA	0		0	101/10	(JR. h
5 6060	PERMIT REQUIREMENT	E					11	- 45 P		1/200	Crab
E. coli Bacteria	SAMPLE MEASUREMENT	47	AN		NA	9851	1986	P. F.	0	on!	Sper
51040	PERMIT REQUIREMENT	5				548	2507	100	A 13	mo	
Hd	SAMPLE MEASUREMENT	NT XA	AM		523	NA	5h L		0	14/10	Skb
00400	PERMIT REQUIREMENT	与			0'9		9.0	5.4.		1/20	4
705	SAMPLE MEASUREMENT	NT N/A	NA	1691	NA	XA	N/A	MA	0	N/A	B/W
70296	REQUIREMENT	NT AEPORT		9			REPORT	3 3		133	mos. Grah
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		FITTEY UNDER PENALTY OF LAW TO BE IN THE STATE OF SUPERVI	HAT THIS DOCUMENT AND ALL, SION IN ACCORDANCE WITH A	ATTACHMENTS WE SYSTEM DESIGN	INE PREPARED			TELEPHONE	ONE		DATE
Robert Par	. (	THAT GOALLFIED FERONMEL EINCERFOX AATHER ND COMLANTE THE GNORMATON SUBJECTED.  BASED ON MY INCOURT OF THE PERSON OIL PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBJECTED ST. TO THE BEST OF MY NOVELL, COECUPAR OF COMPANION.  AMA MANAE THAT THERE AND ESTANDERS.  AMA WHARE THAT THERE AND ESTANDERS.	ERLY GATHER AND EVALUATE BSON OR PENSONS WHO MA E FOR GATHERING THE INFE KNOWLEDGE AND SIELLEF, TR NIFICANT PENALTIES FOR SU	THE INFORMATION NAME THE BYSTICORNATION, THE OFFICE ALL ACCUPATE, ALL ACCUPATE, ALL ALL TING FALL SE	N SUGMITTED, EM, OR THOSE INFORMATION INFORMATION INFORMATION	S. J.	- (	<u>.</u>			
1=		LUDING THE POSSIBILITY OF F. I.C. § 1001 AND 33 U.O.C. § 1319. Naximum imprisonment of between	NE AND MAPRICONNIENT FOR Penalties under these stelutes to 3 months and 5 years)	KNOWING VIOLA		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AL EXECUTIVE	AREA	NIMERE	YEAR	VAC

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments hers)

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DAY

S

YEAR

NUMBER

AREA

NATIONAL POLLUTAN, JOSCHARGE ELIMINATICN SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16)

Form Approved. OMB No. 2040-0004 Approval expires 05-31-98

PERMITTEE NAME/ADDRESS (Include Facility Name/Location 8 District NAME Ramah Water & Sanitation District

OO / DISCHARGE NUMBER NM GO 23396 PERMIT NUMBER

PO. Box 416 Ramah, NM 87321

ADDRESS

MONITORING PERIOD

| DAY | YEAR | MO | DAY |
| 0 | 14 | 03 | 3 |
| 164-25 | (26-27) (28-29) (30-31) FROM 14 03 01 (20-21) (22-23) (24-25)

NOTE: Read Instructions before completing this form Check here if No Discharge

FACILITY MCKINIEY COUNTY, NM	County,	WW	YEAR   YEAR   12/ (20-21) (	YEAR MO DAY 14 03 01 20-21) (22-23) (24-25)	101	YEAR MO DAY U. (26-27) (26-29) (30-31)	☐Chack here if No Discharge NOTE: Read Instructions before completing this form	ischarge ions before c	sompleti	ng this forn	c	
PARAMETER		y) QUA	VTITY OR (54-6		Card Only) (38-45)	QUALITY OR CONCENTRATION (46-53)	RATION (54-61)		S S S	FREQUENCY	SAMPLE	
(32-37)		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS	<u> </u>	(64-68)	(69-70)	
Flour	SAMPLE MEASUREMENT	270.0	0.027	USD	WA	NA	NA	CICIM	7	ulmo	Inst	
5,00%	PERMIT REQUIREMENT	REPORT	REPORT							3/wK	Inst	
BCN	SAMPLE MEASUREMENT	7.7	7.7	1691	NA	10	0)	ma	0	Imo	Orab	
003/0	PERMIT REQUIREMENT	14.5	21.7	10		30	45	7	.0./1	mo	Grab	
155	SAMPLE MEASUREMENT	2.8	8.7	[65]	NA	13	13	/6m	0	01/1	G/L 10	
00530	PERMIT REQUIREMENT	14.5	21.7	9		30	45	1/2		/mo	Grab	
TRE	SAMPLE	NA	NA		NA	NA	0	7077	0	12/m0	Grab	
5 2060	PERMIT						11	77	-	1/170	1/mo Grab	
E. coli Bacteria	SAMPLE	T NA	NA		NA	1732	7821	CFU	0	Imo	Oab	
51040	PERMIT REQUIREMENT			18 N 18 N		548	2507	7000	#	Ino	Grab	
Ho	SAMPLE	T NA	NA		734	NA	7.39		0	13/20	GRB	
00400	PERMIT			LO MAR	0,0		9.0	5.4.	1 1	1/20	Grab	
703	SAMPLE	11 - 12 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	NA	1691	NA	NA	199	ma/	0	1/3mo	Sab	
70296	PERMIT	T REPORT		9			REPORT	1/		mos.	mos. Grab	
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	/E OFFICER ICE	TIPY UNDER PENALTY OF LAW TER MY DIRECTION OR SUPERVI	AT THIS DOCUMENT	A SYSTEM DESIGNED T	THE PREPARED	M	-	TELEPHONE	빙		DATE	
(		HAT GUALFIED FEBSONEL, PROPE BASED ON MY INCUBRY OF THE PERF PERSONS DIRECTLY RESPONSIBLE SUBMITTED IS TO THE DESTO OF MY K	THE GALLIER AND EVALUATE INFO THE FOR GATHERING THE INFO TKNOWLEDGE AND DELIEF, TRUITS FOR SIM	AND THE BYSTEM, IN THE BYSTEM, IN THE BYSTEM, THE BYST	IN SOCIAL LED. INFORMATION OR COMPLETE.						- 7	
TYPED OR PRINTED		C. § 1001 AND 33 U.S.C. § 1319 aximum imprisonneni of between	E AND IMPRISONNE Penalties under these months and 5 years.)	R KNOWING VIOLATIONS, SEE 18 a may include finus up to \$10,000 and		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		AREA NUN	NUMBER	YEAR	MO DAY	
		3 07 01 01	1					1777				7

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

9

NATIONAL POLLUTAN, JISCHARGE ELMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(17-19) PERMITTEE NAME/ADDRESS (include Facility Name Location il District PNAME Ramah Water & Sanitation District

Form Approved. OMB No. 2040-0004 Approval expires 05-31-98

OO / DISCHARGE NUMBER VM 0023396 PERMIT NUMBER

LOCATION MCKINIEY COUNTY, NIM. PO. Box 416 Ramah, NM 87321

ADDRESS

(26-27) (28-29) (30-31) MONITORING PERIOD

| DAY | | YEAR | MO | DAY ဥ FROM | 1 °( 1(/-1, 1/2-6)) (20-21) (22-23) (24-25) YEAR MO

☐Check here if No Discharge

NOTE: Read Instructions before completing this form

61) NO. F	MUM UNITS (62-63) (64-68)	NA NGI) 1 10/m0 Inst	3/WK Inst	6.6 ma, 0 1/no Sub	45 / /mo Grab	5.0 mg/ 0 /mc Gab		0 400 Gab	11 / 1/m. Grab	517 cFa, 0 /me Gab	2507 700ml Ino Grab	7.60 0 2/mo Grab	9.0 5.U. 1mo Grab	N/A Ma/ O N/A Child	APPORT /L 13. Grub	TELEPHONE DATE
(26-27) (28-29) (30-31)  My QUALITY OR CONCENTRATION  (46-53) (54-	AVERAGE	NA		6.6	30	5.0	30	NA		217	548	NA		NA		,
(26-27 Card Only) (38-45)	₹	N/A		AM		NA		NA		NA		152	0.0	NA		VERE PREPARED
2-23) (24-2	UNITS	MGI)	`	163.	19	[65]	10		10 3		restant and the		- Cons	1691	9	LATTACHMENTS V
(20-21) (2) NTITY OR LOADING (54-51)	MAXIMUM	970.0	REPORT	7-1	21.7	3.0	21.7	NA		24		AN		NA NA		AT THIS DOCUMENT AND ALL
(3 Card Only) QUAN	AVERAGE	0.023	1257	-	14.5	0.0	14.5	, 4X		AN		NA		M/A	PERMIT REPORT	ICERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED INVESTOR OF DEPANTION IN ACCORDANCE WITH ASYSTEM CREGNED TO ASSURE
		SAMPLE	REQUIREMENT RODART	SAMPLE MEASUREMENT	PERMIT	SAMPLE	PERMIT REQUIREMENT	SAMPLE MEASUREMENT	PERMIT REQUIREMENT	SAMPLE	PERMIT REQUIREMENT	SAMPLE	PERMIT REQUIREMENT	SAMPLE MEASUREMENT	PERMIT REQUIREMENT	-
PARAMETER	(32-37)	FIALL	100 N	BON	06370	155	00530	TRC	5 8060	E. coli Bacteria	51040	H a	00400	705	10296	NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

NATIONAL POLLUTAN, JISCIARDE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) PERMITTEL NAME/ADDFIESS (Include Facility Named, ocealon # Dilloran)
NAME RAMAH WATEY & SANITATION DISTVICT

00 NM 00 23396 PERMIT NUMBE

87321

Ramah, NM P.O. BOX 416

ADDRESS

Form Approved. OMB No. 2040-0004 Approvel expires 05-31-98

o Discharge

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UMBER		DAY	12
DISCHARGE MUMBER		Ø.	60
Sia	NITORING PERIOD	YEAR	5
	FING		2
E.	NTO	λAΥ	16

		E		SAMPLE	TYPE (69-70)	(2)	7
		mpleting this for		NO. FREQUENCY	NALYSIS		281.
	scharge	ons before co		Z	UNITS (62-63) A		
	Check here if No Discharge	NOTE: Read Instructions before completing this form		VTRATION (54-61)	MAXIMUM		7//
	YEAR   MO   DAY		(26-27) (28-29) (30-31)	QUALITY OR CONCENTRATION (64-53)	AVERAGE		ξ.,
MONITORING PERIOD	Y YEAR	ဂ္	(26-27	(4 Card Only) QL (38-45)	MINIMUM		2.4
MOM	MO DAY	050	(20-21) (22-23) (24-25)	<u>ම</u>	UNITS		
	YEAR MO	FHOM [ 14 ]	(20-21)	QUANTITY OR LOADING (54-61)	MAXIMUM		0000
17		××	- 1	(3 Card Only) QU, (46-53)	AVERAGE		0.000
C   8   1 /		County,		X		CAMBIC	MEASUREMENT 0.000
17C18 1/1/ 1701/01	11.11	LOCATION MCKINIEY COUNTY, NIM		PARAMETER (32-37)			FACE
	FACILITY	LOCALON					T

	X		(54-61)		(4 Card Only) QUI (38-45)	QUALITY OR CONCENTRATION (46-53)	ITRATION (54-61)		50	FREQUENCY	SAMPLE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS	T	ANALYSIS (64-68)	
Flow	SAMPLE MEASUREMENT	1,20.0	0.028	110	AIA	414	4/4	1 3	0	Elm	1
	PERMIT REQUIREMENT		Favo na	1.01			101	J ASI	1	3/2	
		11000	ノントレンド						-	/ W.K	7721
BOD	SAMPLE	3.0	3.0	163,	AN	13	13	Ş	0	1/10	(38.6)
06310	PERMIT REQUIREMENT	74.5	21.7	10		30	45	1	792	1/20	1
183	SAMPLE MEASUREMENT	0.7	0.7	184)	AA	30	30	1	0	OM!	
00530	PERMIT. REQUIREMENT	14.5	21.7	6		30	45	1/1	1-1	1/200	<u> </u>
TRC	SAMPLE MEASUREMENT	. AN	XX		NA	NA	0		10	Jul :	
5 2060	PERMIT REQUIREMENT				7			57 T	)	1/200	7.20
acteria	SAMPLE MEASUREMENT	AN	24		44	1.71	1.7.1	3 1	0		
51040	PERMIT REQUIREMENT					548	2507	7 1	2/2	1/2	
Hd	SAMPLE MEASUREMENT	NA	NA		78.5	AM	7.70			0 18/m	Corb Corb
00400	PERMIT REQUIREMENT			,,80	0.9		9.6	5.4	7.	1/20	
705	SAMPLE MEASUREMENT	N/A	74	1891	NA	XX	NA	3		1/40	
70296	PERMIT REQUIREMENT.	REQUIREMENT: REPORT		9			REPORT	1/2	74	W.E	13 Grish
NAME/111LE PHINCIPAL EXECUTIVE OFFICER	OFFICER UNDER	I CERTIFY UNDER PENALTY OF LAW THUNDER MY DIRECTION OR SUPERVISITION OF SU	THIS DOCUMENT AND ALL	ATTACHMENTS WENE PREPARET A SYSTEM DESIGNED TO ASSURE	HE PREPARED ED TO ASSURE				TELEPHONE		DATE
Robert C	. [	BASED ON NY INCLINY OF THE PERSE FIGHSONIS DIRECTLY RESPONSISE F SUBMITTED B. TO THE BEST OF NY KNI I AM AWARE THAT THERE ARE SIGNIF	ENTA SANTINIA DEL SANTONI CHE MYCHMANION SUGMITTED BSON ON PERSANS WHO MANNAE THE 8/YSTEM, ON THOUS E FOR GATHERING THE INFORMATION, THE INFORMATIO MOWLEDGE AND DELLIET, THUE ACCUPATE, AND COMPLETIE HFIGHAT PERALLIES FOR SUBMITTINIS FALSE INFORMATION.	THE INFORMATIO NAGE THE 9YSTE ORMATION, THE UE, ACCURATE, AN	NA SUBMITTED. EN, OR THOSE INFORMATION ND COMPLETE. ND COMPLETE.	2	• [	-			
PRINTED		DIMG THE POSSIBILITY OF FIL § 1001 AND 33 U.S.C. § 1310.	NED IMPRISONMENT FOR nation under these statutes r mins and 5 years.)	KNOWING VICEATING INC.		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AL EXECUTIVE	AREA	AH INADITA	2	200

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

DAY

8

YEAR

NUMBER

AREA

:

EPA Form 3320-1 (10-98)

15

NATIONAL POLLUTÁN, JISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMP)
(17:16) PERMITTEE NAME/ADDRESS (Include Facility Namer).coathon il Dilloren).
NAME Ramah Water & Sanitation District PO. BOX 416 RAMAH, NM 87321

NM 00 23396 PERMIT NUMBER

ADDRESS

YEAR MO DAY MONITORING PERIOD 1 TO YEAR MO DAY 1 4 06 01 (20-21) (22-23) (24-25)

DISCHARGE NUMBER 0

Form Approved. OMB No. 2040-0004 Approval expiras 05-3 1-93

NOTE: Read Instructions before completing this form Check here if No Discharge

FACILITY NA 1/1 1/2 / 1/2	7		YEAR	MO DAY	YEAR IN	MO DAY	Check here if No Discharge	scharge	-	1		
LOCATION MCKINIEY COUNTY, NIM	County,	N/N	(20-21)	(22-23) (24-25)	(28-27)	(28-29) (30-31)	NOTE: Head Instructions before completing that	ons before	comptetin	mis torm	4	
PARAMETER		(a card Only) QUA (48-53)	QUANTITY OR LOADING (54-61)		(a card Only) QUF (30-45)	QUALITY OR CONCENTRATION (46-53) (54	RATION (54-61)		NO.		SAMPLE	
(32-37)		AVERAGE	MAXIMUM	UNITE	MINIMUM	AVERAGE	MAXIMUM	UNITS	-	ANALYSIS (64-68)	(02-69)	
Flow	SAMPLE MEASUREMENT	770.0	0.043	CIOM	NA	NA	NA		3 7	MO	Inst	
50050	PERMIT REQUIPEMENT.	REQUIPEMENT REPORT	REPORT						X	/wk	inst	
BAN	SAMPLE MEASUREMENT	57.2	52-2	Ilas	AN	51	15	ma	0	140 CM	GRB	
0	PERMIT REQUIREMENT.	4.00	21.7	19		30	45	1		mo	Grab	
7.85	SAMPLE MEASUREMENT	7.4	5.4	189	NA	36	36	/bwi	0	me (	Grb	
00530	PERMIT. REQUIREMENT	14.5	21.7	9		30	45	7/		mo	Grab	
TRC	SAMPLE MEASUREMENT	. NA	NA		NA	NA	0	/ 0/1	0	2/10	Greb	
5 2060	PERMIT PECULPEMENT.			n de malle			$H_{i}$	1		1/110	Grab	
E.coli Bacteria	SAMPLE MEASUREMENT	T NA	NA		NA	613	219	CFW,	0	1,40	Gre b	
51040	PERMIT REDUIREMENT			Research to		548	2507	100		Imo	Grab	
Ha	SAMPLE MEASUREMENT	T NA	MA		7.54	MM	7.65		0	11/110	Grb	
00400	PERMIT				0.9		9.0	3.4.	: '	Imo	Grab	
703	SAMIPLE	11 - FEM 1118	NA	1691	NA	XX	172	Mal	0	1/3000	Steb	
70296	REQUIREMEN	REQUIREMENT A EPOKT		6			REPORT	//		mos.	Grab	
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	/E OFFICER IN	RTIFY UNDER PENALTY OF LAY	THAT THIS COCUMENT AND A VISION IN ACCORDANCE WITH	LLATTACHMENTO V	KINE PREPARED 4ED TO ASSUNE	,		TELEPHONE	ONE		DATE	-
12 Beent		THAT COMPARED TEHROWINGL FROME BASED ON MY INCUMPY OF THE PERR PERSONS ORECTLY RESPONSIBLE SUBMITTED IS TO THE BEST OF MY A 1 AM AWARE THAT THERE ARE BIGN	Pericy dather and Evaluation of Pericy Who Person of Pericy Who Pericy Who Perick Washing The II is known foom the Perick Washing Fort	MANAGE THE BYS MANAGE THE BYS NFORMATION, TIM TRUE, ACCUPANTE, SUBMITTING FALS	ON SUBMITTED.  IEM OR THOSE INFORMATION  AND COLIPPETE.  INFORMATION.	M. C.		_				
A PR		LUDING THE POSSIBILITY OF .C. § 1001 AND 33 U.B C. § 131 NAXIMIM IMPRISCHMEN Of DEWE	FINE AND HAPRISCHMENT FOR D. (Panabios under Noso sladdos IN G Months and 5 years.)	on KNOWING VICL os may include lines	ATIONS. SEE 10	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AL EXECUTIVE	AREA	NUMBER	YEAR	MO DAY	
CONTRACTOR AND TOTAL AND TOTAL AND STATEMENT OF INTERNATION	NITA IOIV VIA EC	to lie constrained of older	Joseph almombald				Ţ				-	٦

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NATIONAL POLLUTAY JECHARDE ELIMINATION SYSTEM (NDES)
DISCHARGE MONITORING REPORT (DMI3)
(2-16) PERMITTER NAME/ADDRESS (Include Finellity Mannel conton II Dillowal)
NAME Ramah Water & Sanitation District

00 NM 00 23396 PERMIT NUMBER

Form Approved. OMB No. 2040-0004 Approval expires 05-31-98

DISCHANGE NUMBER FROM 7/114 2 / 01 TO 2/14 07 (20-21) (22-23) (24-25) MONITORING PERIOD

PO. Box 416 Ramah, NM 87321

ADDRESS

	12/10 1:	į		MONITO	MONITORING PERIOD							
FACILITY LOCATION MICKING AND	7	700 7	YEAR	MO DAY	1 1	MO DAY	☐Check here if No Discharge	Ischarge				
(10.51) 1E y	County,	NW	(20-21)	(22-23) (24-25)	1 TO (2014 (28-27)	(28-29) (30-31)	MOTE: Read Instructions before completing this form	llons before c	ompleting	this form		
PAHAMETER (32-37)	$\setminus$	(3 Card Only) QUAN (46-53)	NTITY OF LOADING (54-61)		(4 Card Only) QU (30-45)	QUALITY OR CONCENTRATION	THATION		NO. FRE	FREQUENCY S.	SAMPLE	
		AVERAGE	MAXIMUM	UNITE	MINIMUM	AVERAGE	MAXIMUM	UNITS	_	YSIS 58)	TYPE (69-70)	
Flow	SAMPLE MEASUREMENT	0.026	0.031		AIA	414	4/4		(1)	1.,	I'nst	
0	REQUIPEMENT	REPORT	REPORT	MOV					i	1 1	Inst	
Bob	SAMPLE MEASUREMENT	0.507	0.807	163.	NA	h.h	11.4		0	<del>`\</del>	7.7.6	
00310	REQUIREMENT	14.5	21.7	19		30	7 2	5/	)	T	Serve S	
755	SAMPLE MEASUREMENT		7	1841	40	0.9	0.0	7 5	-	_1	7 20 7	
00530	PERMIT	14.5	21.7	10		30	Z Z Z	2		3	C. 22 L.	
TRC	SAMPLE MEASUREMENT	. 4×	XX		NA	NA	and to			16/20	0 7 2 0	
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COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

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MATIONAL POLLUTAIN JECTIANGE ELIMINATION SYSTEM (NIDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16)

PERMITTER NAME/ADDRESS (Include Facility Munimilaration II Dillowall)
NAME Ramah Water & Sanitation District PO. Box 416 Ramah, NM 87321

ADDRESS

MONITORING PERIOD
| DAY | YEAR | MO | DAY OO / NM 00 23396 PERMIT NUMBER YEAR | MO | DAY , ( FROM

Form Approved. OMB No. 20:10-0004 Approval expires 05:31-98

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COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

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MATIONAL POLLUTAN SACIAND SISTEM (INDES)
DISCHARGE MONITORING REPORT (DMIT)
(2-16) PERMITTE. AME/ADDRESS (Include Fincilly Mannel Cocation il Ollower)

NM 0023396 87321

PERMIT NUMBER

MONITORING PERIOD

Ramah, NM P.O. BOX 416

ADDRESS

OO / DISCHANGE NUMBER

Form Approved. OMB No. 2040-0004 Approval expires 05-31-98

NOTE: Read Instructions before completing this form . 전 연 연 연 UNITS Check here if No Discharge MAXIMUM QUALITY OR CONCIENTRATION (46-53) (54-61) AVERAGE (26-27) (28-29) (30-31) TO 14 09 DAY MINIMUM (4 Card Only) (30-45) (20-21) (22-23) (24-25) UNITE YEAR MO QUANTITY OF LOADING (54-61) PI MOFI MAXIMUM AVERAGE (3 Card Only) (46-53) McKinley County, NM PARAMETER (32-37) FACILITY LOCATION

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COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

TYPED OR PRINTED

(REPLACES EPA FORM T-10 WHICH MAY NOT BE USED.)

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DAY

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YEAR

NUMBER

APEA

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

# Appendix D – RW&SD AO Reply dated July 23, 2013 and WET Biomonitoring Report dated January 30, 2013

# Ramah Water & Sanitation District

P.O. Box 416 Ramah, NM 87321 TEL: 505-783-4018 FAX: 505-783-4822 Email: ramahwater@wildblue.net Corr

# Patrick Riley Chairman Finances/Employment

Robert Cain Vice Chairman Wasterwater

Treatment

William Becker Board Member Dorothy Osterhout

Board Member

Tucker Simons
Treasurer

July 23, 2013

Mr. James Eng Water Enforcement Branch (6EN-WM) EPA Region 6 10625 Fallstone Road Houston, TX 77099



RE: Administrative Order, Docket Number: CWA-06-2013-1814 NPDES Permit Number: NM0023396

Dear Mr. Eng:

- Paxni/CO
2: AO & AO P
3: DMR's
- Vio. Sum. L
5: NCR
- Correspondence
7: CRAS
Date Filled

My name is Patrick A. Riley and I am the newly elected Chairman of the Board for Ramah Corporation Water & Sanitation District. I am writing in response to the Administrative Order, Docket Number: CWA-06-2013-1814 and NPDES Permit Number: NM0023396. Below are comments and updates per our current situation concerning your findings:

A whole effluent toxicity test was performed on April 11, 2013 a copy of the results are enclosed.

Our operation staff consists of a plant operator who just received his Level 2 Waste Discharge and also has a Level 1 Water Operator Certification. He will acquire his Level 3 Waste Discharge certification when eligible. In the meantime, he will add to his Water Certifications.

We have a backup operator who holds both Level 1 certifications in Water & Wastewater Discharge.

The treatment plant clarifier is free of floating sludge. The chlorine contact chamber was cleaned and is now functioning as designed. We are working now to clear the skimmers so that they will once again be operational. Next, we must replace the aerators to improve their performance. Then the sludge collection at the bottom of the clarifier will be brought into spec.

The flow meter will be calibrated as specified and records kept of regularly scheduled calibrations.

McKinley County through the Northwest Council of Governments as recently notified us of a planned PER concerning our entire waste water system. Pending the results of the PER, we anticipate acquiring a second full waste water plant so that our current plant will be used as an alternate and as a backup system.

Administratively we are creating operations logs, checklists, and files for all our procedures. I am astonished to find that this has never before been accomplished. A total reorganization is in order and in process.

Mr. Eng, this is a summary of our situation at this time. Our greatest concern is funding as we only have 133 customers in our district.

Sincerely,

Patrick Riley

Ramah Water & Sanitation District - Chairman

### RAMAH WATER AND SANITATION DISTRICT OUTFALL 001

48-Hour Acute Biomonitoring Report Permit Number NPDES NM0023396

Daphnia pulex

January 30, 2013

Reviewed by:

Toni Nesbitt, QA/QC Officer

Huther & Associates, Inc. 1156 North Bonnie Brae

Denton, Texas 76201 (940) 387-1025, Fax: (940) 387-1036

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APPENDIX C: CHAIN OF CUSTO				Page 6



### 48-HOUR ACUTE TOXICITY TEST REPORT

Client: ..... Ramah Water and Sanitation District Begin Date: ...... January 30, 2013 NPDES No.:.....NM0023396 Sample: ..... Outfall 001

Results: Pass Daphnia pulex survival at the critical low flow concentration (100% effluent).

### SAMPLE COLLECTION

Composite effluent samples from the Ramah Water and Sanitation District were delivered by United Parcel Service courier to Huther and Associates on January 30 and January 31, 2013. The samples were manually collected and composited from Outfall 001 by facility personnel. One toxicity test was requested: a static renewal 48-hour definitive toxicity test using Daphnia pulex (Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fifth Edition, EPA-821-R-02-012).

environmental toxicologists, biologists, and consultants

The samples were analyzed for total residual chlorine (Standard Methods, 22<sup>rd</sup> Edition, 4500-Cl D) and contained <0.01 mg/L and <0.01 mg/L respectively. Effluent and laboratory water temperature, conductivity, hardness, alkalinity, pH, and dissolved oxygen data were collected and recorded.

TEST SETUP Daphnia pulex



The 48-hour D. pulex toxicity test was initiated at 1605 hours, January 30. 2013. Five concentrations were prepared for testing (32%, 42%, 56%, 75%, and 100% effluent) utilizing distilled, deionized laboratory water reconstituted to match the hardness, alkalinity and pH of the receiving stream (Togeye Drain) as dilution water. The test was conducted using 25 mL distilled water rinsed plastic beakers containing 15 mL of test solution. Eight neonates less than 24 hours old were added to each of five replicate chambers per concentration. The test was renewed with fresh solutions on January 31, 2013. The test proceeded for 48-hours during which survival and water quality were recorded daily.

A control of five replicate chambers containing the appropriate number of organisms in synthetic laboratory water was conducted concurrently with the test. There was 100% survival in the control. The test ended at 1605 hours, February 1, 2013. Control data met all test acceptability criteria.

RESULTS Daphnia pulex

There was 100% survival to D. pulex in all of the effluent concentrations tested. Therefore, statistical analyses were not required to determine a no effect concentration.

LOEC: Not Applicable NOEC: 100% Effluent Lab ID# 20596

Te. Date: January 30, 2013

SUMMARY

There were no statistically significant differences between the control and the critical low flow concentration (100% effluent) to Daphnia pulex survival. Based on biomonitoring requirements for Outfall 001 contained in Permit Number NPDES NM0023396 for the Ramah Water and Sanitation District, Outfall 001 passed for this testing period.

# 48-hour Daphnia pulex Acute Definitive Toxicity Test

CLIENT Ramah Water and Sanitation District	SAMPLE TYPE	24 hr Composite
NPDES # NM0023396	DATE COLLECTED	01/29/13 01/30/13
LAB ID # 20596	DATE RECEIVED	01/30/13 01/31/13
TEST TYPE Acute Static Renewal	BEGIN DATE/TIME	01/30/13 1605
TEST ORGANISM Daphala pules	END DATE/TIME	02/01/13 1605
ORGANISM AGE < 24-Hours	TEST TEMPERATUI	RE (°C) 25 3 1
ORGANISM SOURCE In-house	PHOTO PERIOD	16-Hr Light 8-Hr Dack
RECEIVING WATER Togeye Drain	LIGHT INTENSITY	: 50-100 Ft. Cnd1.
DILUTION WATER Laboratory Adjusted	TECHNICIAN	M. Horner

### SURVIVAL SUMMARY

Effluent Conc.(%)	3 A S	351	Start					716					S Ho			Salvin	CV%
	A	②B高	G	D	<b>第:</b> 場	至A推	學達	题+等	D		<b>3</b>	<b>3:3</b>	EC.	層D家	學是		
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56%	B	8	- 8	8	8	8	8	8	8	8	8	8	8	. B.	8	100.0	0.00
75%	8	8	8	8	В	8	8	8	8	- 8	8	8	8	8	8	100.0	0.00
100%	8	В	8	8	8	В	8	8	8	8	8	8	8	В	8	100.0	0,00

### WET CHEMISTRY MEASUREMENTS

Date	Time	Temp	Sum.			N(mil)	of Solution			
			110	Con	<b>18821 E</b>	<b>建筑长以</b>			(0)	Analys
01/30/13	Start	25.0	1	8.99	8.57	B,43	8.57	8.01	7.78	STC
01/31/13	24 Hr.	24.4	等的智慧	9.32		S 19 19 19 19 19 19 19 19 19 19 19 19 19	VAL			South
01/31/13	Renew	25.0	2	8.50	8.38	8.22	8.15	8.04	7.83	CIT
02/01/13	48 Hr.	24.4			是是		E EYES	9.36	8.48	MAN THUM

Date	Time	Тепр					o(esomilia)			Applys
01/30/13	Start	25.0		7.64	8,15	7.95	7.85	7.82	7.99	STC
01/31/13	24 Hi.	24.4		7.83	一次 中	A	120	101	1/92	CIT
01/31/13	Renew	25.0	2	8.61	8.65	8.64	8.61	8.70	7,91	CTT
MINITA	48 Hr.		· AND EMPTY AND STATE OF THE PARTY OF THE P	<b>完成的。1995年</b>	ATTENDED IN THE RESERVE	TO THE REAL PROPERTY.	CASTA BARREN	THE MAN SHEET	a property of the property	California California

Date	Sample No:	pH!	DO,	Hardness mg/L CaC03 J	Alkalinity mg/l-CaCO3	Conduct umbos/em	Resid.Cl2 mg/L	Dechlor(mL) Na2S2O3 mg/L	Analyst
01/30/13	1	7.78	7.99	. 320	264	829	<0.01	N/A	TN
01/31/13	2	7.83	7.91	316	256	835	<0.01	N/A	TN
01/30/13	Control	8.99	7,64	168	108	319	-		TN

<sup>1</sup> Measurements taken in 100% solution.

APPENDIX A: RAW DATA

# Huther and Associates, Inc.

environmental toxicologists, biologists, consultants

### 48-HOUR DAPHNIA PULEX SURVIVAL

CLIENT:

Ramah

PROJECT#:

20596

	N	UMBE	R ORG		1S, .	И		R ORG 34 HR	ANISM S	is.	וא	UMBE	R ORGA 48 HRS		S,	97	
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19				- 4						(i)	1						
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Outfall		DO1	en 7	2050	f.		Orffermen	.1.	rece	Д	
Lab ID	No.:		2059	6	0						
Begin ?	Time/ D	ate	1-30	-13	1605	5	End Date	e/Time	2-1-	13 1605	)
Date	Time	Temp	Samp.			Hq	(mg/L) of Soh	ition			Analysi
			No.	CON	32	42	56	75	100		
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131	24 Hr	24.4	1	8.32	8.3	7 8.38	8.41	843	8.46		رب
1/3/	Renew	25.0	2	8.50	8.3	8 f.22	8.15	8.04	7.83	3	0
2-11	48 Нг.	24.4	2	8.27	8.3	1 8.32	8.34	8.36	8-38	2	even
			1								
Date	Time	Temp	Samp.			DC	(mg/L) of Sol	បស់បា			Analyst
	•		No.	CON	3:	2 42	36	75	106		
V30	Start	25.0	(	7.64	8.15	7.95	283	7.82	7,99		26
1/31	24 Hr	24.4	1	7.83	7.8	1 7.88	7-82	7.94	7.92		·
1/31	Renew	25.0	2	8.61	8.6.	5 8.64	8.61	8.70	7.91		سسي
2/1	48 Hr.	24.4	2	7.62	7.64	9 7.74	7.74	7.78	7.79	2	4
							)rganism:				
Begin 7	Time/ D	ate	1				End Date/	Time		3	
	T-	20		1							
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					-						
	Start										
	24 Hr										
	Renew				<u> </u>						
	48 Hr.										
	m·	T	Samp.			DO	(sig/L) of Soh	ition			Analyst
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	24 Hr.	-	/								
3	Renew				1						
	48 Hr.	_	SES								
		<u>}</u>	***	1				<u> </u>			<u> </u>
Date	Samp. No.	РН	DO	Hard mg/L C		Alkalinity tng/L CaC03 <sup>1</sup>	Conduct umbos/cm		d CI2 .	Dechlor (mL) Na2S2O3 mg/L'	Analyst
1/30	1	7.78	7.99	32	30	964	829	20.	01		TI
/31	2	7.83	7.91	310		256	835	<del></del>	.01	Na Na	6
7	Con.	899	1							<u> </u>	
/30	ليسيا	011	7.01	1 109	2	108	319				

APPENDIX B: REFERENCE TOXICANTS

# ACUTE REFERENCE TOXICANT TEST RESULTS

SPECIES:

Daphnia pulex

CHEMICAL:

Sodium Chloride

**DURATION:** 

48-Hours

TEST NUMBER:

1

TEST DATE:

01/03/13 - 01/05/13

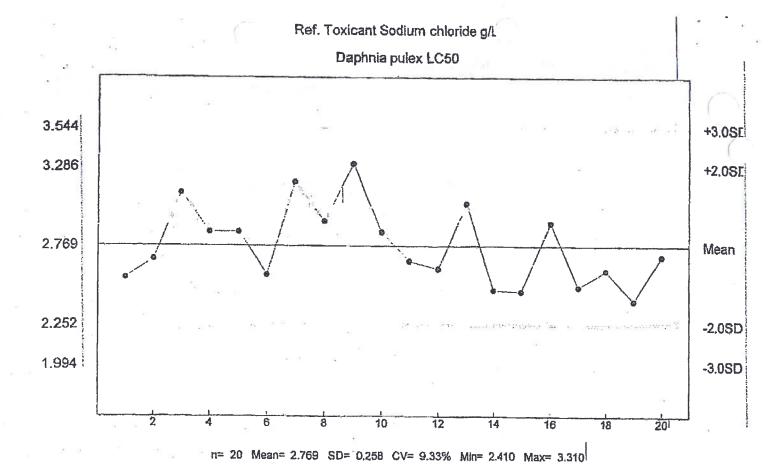
1100 - 1100

STATISTICAL METHOD:

Spearman-Karber

CONCENTRATION (g/L)	NUMBER EXPOSED	NUMBER DEAD
1.0	20	0
2.0	20	0
2.5	20	6
3.0	20	16
4.0	20	20
5.0	20	20

LC50	95% LOWER CONFIDENCE LIMITS	95% UPPER CONFIDENCE LIMITS
2.70 g/L	2.55 g/L	2.87 g/L



APPENDIX C: CHAIN OF CUSTODY

HUTHER & ASSOCIATES 1156 NORTH BONNIE BRAE STREET DENTON, TX 76201 (940) 387-1025 • FAX (940) 387-1036

# CHAIN OF CUSTODY RECORD

PROJECT NAME. PROJECT#

PERMIT# LIPDES LIMOORSESILO

**OUTFALL SAMPLES** 

24-Hr Flow Weighted Composite Y Other

	METHODS OF COLLECTION AND COMPOSITE	DEL. MANUAL COLL. AUTO COLL. # OF CONTAINER.  MANUAL COMP. MANUAL COMP. TO BE SHIPPED			
	M	AUTO COLL. AUTO COMB.			
		# OF PORTIONS COMPOSITED	9		
		END DATE/TIME	1/29/13 9:12m		
		START DATE/TIME	V/28/13 10:57km 1/29/13	·	
*		PERSON TAKING SAMPLE	C. CATO		
		OUTFALL NUMBER	8	9	

2ND PAGE - FACILITY COPY

1ST PAGE - LAB COPY

environmental toxicologists, biologists, and consultants

### RAMAH WATER AND SANITATION DISTRICT NPDES PERMIT NUMBER NM0023396 BIOMONITORING REPORTING TEST DATE: 01/30/13

I. Daphnia pulex	Response
1. If the NOEC for survival is less than the critical dilution, enter a "1"; otherwise, enter a "0" for Parameter TEM3D.	0
2. Report the NOEC value for survival, Parameter No. TOM3D.	100%
<ol> <li>Report the highest (critical dilution or control) Coefficient of Variation, Parameter No. TQM3D.</li> </ol>	0.00

Fax: (940) 387-1036